

ESTTA Tracking number: **ESTTA716138**

Filing date: **12/21/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059944
Party	Plaintiff Peoples Club of Nigeria International Princeton Junction, NJ Branch, Inc., Peoples Club of Nigeria International-Miami Branch and Peoples Club of Nigeria International-Chicago Branch
Correspondence Address	CRAIG S HILLARD STARK & STARK PC 993 LENOX DRIVE, BLDG 2 LAWRENCEVILLE, NJ 08648 UNITED STATES chilliard@stark-stark.com, eparks@stark-stark.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	Craig S. Hilliard, Esq.
Filer's e-mail	chilliard@stark-stark.com, mtaylor@stark-stark.com, eparks@stark-stark.com
Signature	/Craig S. Hilliard/
Date	12/21/2015
Attachments	NOR_Exh.A-Exh.P (12-21-15).pdf(2118484 bytes) NOR_Exh.Q-Exh.T (12-21-15).pdf(3988515 bytes)

STARK & STARK
A Professional Corporation
993 Lenox Drive, Bldg. 2
Lawrenceville, NJ 08648-2389
Phone: (609) 895-7346
Fax: (609) 895-7395
Attorneys for Petitioners

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Registration No. 4,591,874
For the Mark: Peoples Club of Nigeria International Service Mark
Date registered: 08-26-2014

PEOPLES CLUB OF NIGERIA
INTERNATIONAL (PCNI),
PRINCETON JUNCTION BRANCH,
PCNI CHICAGO, IL, PCNI MIAMI
BRANCH,

Petitioners,

v.

PEOPLES CLUB OF NIGERIA
INTERNATIONAL, INC., A New
Jersey Corporation,

Registrant.

NOTICE OF RELIANCE

TO: Commissioner for Trademarks
PO Box 1451
Alexandria, VA 22313-1451

Petitioners' Notice of Reliance

Petitioners Peoples Club of Nigeria International ("PCNI") Princeton Junction branch, Chicago branch and Miami branch (collectively the "Petitioners") submit the following Notice of Reliance:

1. Pursuant to T.B.M.P. 704.01, 704.07, 37 C.F.R. §2.122(e) and all applicable laws,

Petitioners hereby introduce into evidence the following official records:

Document	Identifier (Bates stamp reference)	Relevance
PCNI-Princeton Junction Branch, NJ Filing Certificate (dated December 4, 2006)	Petitioners 0009; attached hereto as Ex. "A"	Business registration document for Petitioner PCNI-Princeton Junction Branch
PCNI-Document Establishing Branch—PCNI Chicago (dated July 2007)	Petitioners 0014; attached hereto as Ex. "B"	Document indicating Petitioner PCNI-Chicago as established branch
PCNI, Inc., NJ Filing Certificate (dated August 18, 2010)	Petitioners 0037; attached hereto as Ex. "C"	Business registration document for Registrant PCNI, Inc.
PCNI, Inc. NJ Certificate of Incorporation, Nonprofit (dated August 18, 2010)	Petitioners 0048-49; attached hereto as Ex. "E"	Business registration document for Registrant PCNI, Inc.
PCNI-Document Establishing Branch—PCNI Miami (dated August 1998)	Petitioner 0161; attached hereto as Ex. "E"	Document indicating Petitioner PCNI-Miami as established branch
PCNI Miami Online Non Profit Corporation Detail Sheet (filed with the State of Florida)	Petitioner 0162-163; attached hereto as Ex. "F"	Document indicating Petitioner PCNI-Miami as Florida entity
Letter from the Office of the Secretary of State, State of Illinois Issuing Articles of Incorporation for PCNI-Chicago (dated January 20, 2006)	Petitioners 0167-169; attached hereto as Ex. "G"	Document indicating Petitioner PCNI-Chicago as Illinois entity
Letter from Secretary of State, State of Texas re PCN, USA (dated February 29, 2000) with attached Articles of Incorporation (filed February 29, 2000)	Petitioners 0170-173; attached hereto as Ex. "H"	Business registration document for PCN, USA.

2. Pursuant to TBMP 704.03, 704.04 and 37 C.F.R. §2.122(e) and all applicable

laws, Petitioners hereby introduce into evidence copies of the following official records of the

Patent and Trademark Office, copies of which are attached:

USPTO Trademark/Service Mark Application, TEAS Plus Application (filing date 11/12/13)	Exhibit "I"	Subject trademark application
USPTO Office Action (dated	Exhibit "J"	Office Action

2/27/14)		
Registrant's Response to Office Action (dated 4/9/14)	Exhibit "K"	Response to Office Action
USPTO Trademark Registration (Reg. No. 4,591,874)	Petitioners 0001-0002; attached hereto as Ex. "L"	Subject trademark registration
Petition to Cancel USPTO Filing Receipt (dated 9/16/14)	Exhibit "M"	Petition to Cancel Filing Receipt
Petition to Cancel	Exhibit "N"	Petition to Cancel
Answer in response to Petition to Cancel	Exhibit "O"	Answer in response to Petition to Cancel

3. Pursuant to 37 C.F.R. §2.120(j)(3)(i) and all applicable laws, Petitioners hereby introduce into evidence Registrants' Initial Written Disclosures with documents, attached hereto as Exhibit "P."

4. Pursuant to TBMP 704.10 and 37 C.F.R. §2.120(k) and all applicable laws, Petitioners hereby introduce into evidence Registrants' Answers and Objections to Petitioners' First Set of Interrogatories, together with the pertinent enclosures and documents Bates stamped (000001-000049) referenced therein. These Interrogatory responses, with documents, are attached as Exhibit "Q." By way of further clarification, Petitioners introduce the responses, and documents referenced in, Registrants' responses to request numbers 1 through 18. *See Kohler Co. v. Baldwin Hardware Corp.*, 82 U.S.P.Q.2d 1100, 1103 (TTAB 2007).

5. Pursuant to 37 C.F.R. §2.120(j)(1) and all applicable laws, Petitioners hereby designate and make part of the record of this case the following discovery deposition, together with exhibits introduced and referred to in the designated testimony:

Dr. Ambrose Mgbako Testimony (taken June 10, 2015) with Exhibits P-1 through P-3	Attached as Exhibit "R"
--	-------------------------

6. Pursuant to TBMP 704.08, Safer, Inc. v. OMS Investments, Inc., 94 U.S.P.Q. 2d 1031 (TTAB 2010) and all applicable laws, Petitioners hereby introduce into evidence the following internet materials:

Document	Identifier (Bates stamp reference)	Relevance
PCNI “Official Website”	Petitioners 0010-11; attached as Exhibit “S”	Demonstrates that Petitioners are recognized branches of PCNI as of April 27, 2015 at 11:50 a.m.
PCNI “Official Website”	Petitioners 0015-16; attached as Exhibit “T”	Demonstrates that Petitioners are recognized branches of PCNI as of March 3, 2015, at 11:14 a.m.

7. Pursuant to Trademark Rule 2.123, the following testimonial depositions were taken during Petitioners Testimony Period and will be timely filed with the Board, together with exhibits introduced and referred to in the designated testimony:

Trial Deposition	Date of Deposition
Dr. Ambrose Mgbako	December 2, 2015
Gordian Ndubizu	December 8, 2015
Dr. Anayo Ukeje	December 11, 2015

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have, on this 21st day of December 2015, delivered a true and accurate copy of the attached Notice of Reliance, via regular and electronic mail to the following:

Matthew H. Swyers, Esquire
The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
Attorneys for Registrant

I, the undersigned, hereby certify that I have, on this 21st day of December 2015, delivered a true and accurate copy of the attached Notice of Reliance, via Certified Mail and electronic filing to the following:

Commissioner for Trademarks
PO Box 1451
Alexandria, VA 22313-1451

STARK & STARK
A Professional Corporation

By: _____

CRAIG S. HILLIARD

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Exhibit “A”

STATE OF NEW JERSEY
DEPARTMENT OF TREASURY
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL
PRINCETON JUNCTION, NJ BRANCH INC.
0100972745

*I, the Treasurer of the State of New Jersey,
do hereby certify, that the above named business
did file and record in this department a
Certificate of Incorporation on December 4th, 2006
and that the attached is a true copy of this
document as the same is taken from and compared
with the original(s) filed in this office and now
remaining on file and of record.*

IN TESTIMONY WHEREOF, I have
hereunto set my hand and
affixed my Official Seal
at Trenton, this
19th day of December, 2006



Bradley Abelow

Bradley Abelow
State Treasurer

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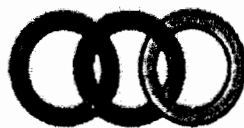
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Exhibit “B”

PEOPLES CLUB OF NIGERIA INTERNATIONAL

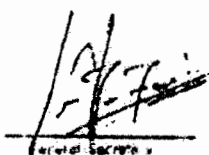


Motto: Unity, Love And Service

Instrument Establishing A Branch

This is to certify that having been satisfied that
provisions of section TWENTY of our
constitution have been complied with a Branch of
People's Club of Nigeria International is this 28th day of
JULY..... 2007 established at CHICAGO, IL...

Dated this 28th day of JULY..... 2007


Branch Chairman


Secretary

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Exhibit "C"

STATE OF NEW JERSEY
DEPARTMENT OF THE TREASURY
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.
0101010702

*I, the Treasurer of the State of New Jersey,
do hereby certify, that the above named business
did file and record in this department a
Certificate of Incorporation on August 18th, 2010
and that the attached is a true copy of this
document as the same is taken from and compared
with the original(s) filed in this office and now
remaining on file and of record.*



Certificate Number: 117588576

Verify this certificate online at

https://www.treasury.nj.gov/TTTR/StampingCertUSP/Verify_Cert.jsp

IN TESTIMONY WHEREOF, I have
herewith set my hand and affixed
my Official Seal at Trenton, this
19th day of August, 2010

A handwritten signature in black ink, appearing to read "Andrew P. Sidamon-Eristoff".

Andrew P. Sidamon-Eristoff
State Treasurer

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Exhibit “D”



Division of Commercial Recording
Certificate of Incorporation, Nonprofit
(Title 15A:22-8 New Jersey Domestic Nonprofit Corporation Act)

NP
FILED
AUG 18 2010
STATE TREASURER

This is to Certify that, there is hereby organized a corporation under and by virtue of the statute of the New Jersey Statutes.

0101010702

1. Name of Corporation: **PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.**
2. The purpose for which this corporation is organized is:
TO PROVIDE AND PROMOTE RECREATIONAL AND SOCIAL FACILITIES FOR ITS MEMBERS AND THE PUBLIC IN GENERAL

3. Registered Agent's Name: **DR IDDI AMBROSE MGBAKO**
4. Registered Office/Address:

Street Address City State Zip
16 WRIGHT STREET EDISON NJ 08820

5. The corporation Shall have members. ☒ Yes ___ No. If yes, qualification will be:
☒ as set forth in the bylaws. ___ or as set forth herein (attach).
6. The rights and limitations of the different classes of members will be:
☒ as set forth in the bylaws. ___ or as set forth herein (attach).
7. The method of electing trustees will be:
☒ as set forth in the bylaws. ___ or as set forth herein (attach).
8. The first board of trustees shall consist of 4 trustees (Minimum of three. Addresses cannot be that of the corporation).

Name Street Address City State Zip

See attached.

9. The duration of the corporation is: **PERPETUAL**
10. Set forth Name and Address of Incorporator(s) (Address cannot be that of the corporation. Need one or more.):

Name Street Address City State Zip

**SEBASTIAN O. IBEZIM, JR. 936 BROAD ST, 2ND FL. NEWARK
NEW JERSEY, 07102**

11. Method of distribution of assets shall be: ☒ as set forth in the bylaws. ___ or as set forth herein (attach)
12. Other provisions:

In Testimony whereof, each undersigned incorporators have caused this certificate to be signed this 17th day of AUGUST 2010

Signature: [Signature] Signature: _____
Signature: [Signature] Signature: _____

8. Continued. Names and addresses of first Board of Trustees.

Eze Desmond Ogugua
15426 Devan Wood Drive
Woodbridge, VA 22193

Ignatius Ojukwu-Ike
8103 Autumn Trace Court
Houston, Texas 77083-6943

Uchegbulem Aloysius Eze
3626 Truesdale Drive
Missouri City, Texas 77459

Prof. Innocent T. Aluka
19526 Sedcreek Drive
Katy, Texas 77449

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Exhibit "E"

PEOPLES CLUB OF NIGERIA

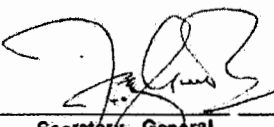


Motto: Unity And Love

Instrument Establishing A Branch

This is to certify that having been satisfied that
provisions of section TWENTY of our
constitution have been complied with a Branch of
People's Club of Nigeria is this 22nd day of
AUGUST 1998 established at MIAMI, FLORIDA

Dated this 22nd day of AUGUST 1998


Secretary General


Branch Chairman


President

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Exhibit "F"

Detail by Entity Name

Florida Non Profit Corporation

PEOPLES CLUB OF NIGERIA INTERNATIONAL, INC. - MIAMI BRANCH

Filing Information

Document Number N02000006745
FE/EIN Number 113651814
Date Filed 09/03/2002
State FL
Status ACTIVE
Last Event REINSTATEMENT
Event Date Filed 04/30/2010
Event Effective Date NONE

Principal Address

2530 NW 131ST STREET
MIAMI, FL 33167

Changed: 04/30/2008

Mailing Address

2530 NW 131ST STREET
MIAMI, FL 33167

Changed: 04/30/2008

Registered Agent Name & Address

OBIESIE, EMMANUEL DR
2530 NW 131ST STREET
MIAMI, FL 33167

Name Changed: 04/30/2008

Address Changed: 04/30/2008

Officer/Director Detail

Name & Address

Title DC

OBIESIE, EMMANUEL DR
2530 NW 131ST STREET
MIAMI, FL 33167

Title DFS

OSUJI, JUDE
7373 NW 174TH TERRACE, #106
MIAMI LAKES, FL 33015

Title D

OKPALA, EMMANUEL
20050 NW 85 CT
MIAMI, FL 33015

Title Director, Secretary

Miami, FL 33169

Title Director

Anam, Oliver O, Dr.
966 NW 100 Ave
Pembroke Pines, FL 33024

Annual Reports

Report Year	Filed Date
2012	04/27/2012
2013	04/30/2013
2014	04/30/2014

Document Images

04/30/2014 -- ANNUAL REPORT	View image in PDF format
04/30/2013 -- ANNUAL REPORT	View image in PDF format
04/27/2012 -- ANNUAL REPORT	View image in PDF format
04/26/2011 -- ANNUAL REPORT	View image in PDF format
04/30/2010 -- Reinstatement	View image in PDF format
04/30/2008 -- ANNUAL REPORT	View image in PDF format
05/16/2007 -- REINSTATEMENT	View image in PDF format
07/19/2005 -- ANNUAL REPORT	View image in PDF format
03/12/2004 -- ANNUAL REPORT	View image in PDF format
05/30/2003 -- ANNUAL REPORT	View image in PDF format
09/03/2002 -- Domestic Non-Profit	View image in PDF format

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Exhibit “G”



OFFICE OF THE SECRETARY OF STATE

JESSE WHITE • Secretary of State

JANUARY 20, 2006

6471-558-5

ALEX CHINYERE OGOKE
1954 W IRVING PARK RD
CHICAGO, IL 60613

RE PEOPLES CLUB OF NIGERIA INTERNATIONAL CHICAGO, ILLINOIS

DEAR SIR OR MADAM:

ENCLOSED YOU WILL FIND THE ARTICLES OF INCORPORATION OF THE ABOVE NAMED CORPORATION. THE CORPORATION IS REQUIRED TO FILE AN ANNUAL REPORT EACH YEAR. BLANK FORMS WILL BE MAILED BY THIS OFFICE TO THE REGISTERED AGENT AS SHOWN BY OUR FILES APPROXIMATELY 60 DAYS PRIOR TO ITS ANNIVERSARY MONTH. (ORIGINAL DATE OF INCORPORATION).

THE REQUIRED FEE OF \$50.00 IN THIS CONNECTION HAS BEEN RECEIVED AND PLACED TO YOUR CREDIT.

THIS DOCUMENT MUST BE RECORDED IN THE OFFICE OF THE RECORDER OF THE COUNTY IN WHICH THE REGISTERED OFFICE OF THE CORPORATION IS LOCATED. FOR FURTHER INFORMATION CONTACT YOUR RECORDER OF DEEDS.

CERTAIN NOT FOR PROFIT CORPORATIONS ORGANIZED AS A CHARITABLE CORPORATION ARE REQUIRED TO REGISTER WITH THE OFFICE OF THE ATTORNEY GENERAL. UPON RECEIPT OF THE ENCLOSED ARTICLES OF INCORPORATION, YOU MUST CONTACT THE CHARITABLE TRUST DIVISION, OFFICE OF THE ATTORNEY GENERAL, 100 W. RANDOLPH, 3RD FLOOR, CHICAGO, ILLINOIS 60601 TELEPHONE (312) 814-2595.

THE ISSUANCE OF THE ARTICLES OF INCORPORATION DOES NOT ENTITLE THE CORPORATION TO A PROPERTY TAX EXEMPTION. YOU MUST APPLY FOR THAT EXEMPTION THROUGH THE BOARD OF REVIEW IN THE COUNTY WHERE THE REAL ESTATE IS LOCATED.

THE DEPARTMENT OF BUSINESS SERVICES IS NO LONGER ISSUING A CERTIFICATE ATTACHED TO THE ARTICLES OF INCORPORATION AS OF FEBRUARY 15, 2002.

SINCERELY,

JESSE WHITE
SECRETARY OF STATE

DEPARTMENT OF BUSINESS SERVICES
TELEPHONE (217) 782-6961

FORM NFP 102.10 (rev. Dec. 2003)
ARTICLES OF INCORPORATION
General Not For Profit Corporation Act

Jesse White, Secretary of State
Department of Business Services
Springfield, IL 62756
217-782-9522
www.cyberdriveillinois.com

Remit payment in the form of a cashier's



CP0908475

der or
sk

Jesse White Secretary of State

FILED: 1/20/2006

64715585

PHS

File #

Filing Fee: \$50

Approved: _____

----- Submit in duplicate ----- Type or Print clearly in black ink ----- Do not write above this line -----

Article 1. Name of Corporation: Peoples Club of Nigeria International Chicago, Illinois

Article 2. Name and Address of Initial Registered Agent and Registered Office:

Registered Agent Alex chinyere Ogoke, Esq.
First Name Middle Name Last Name

Registered Office 1954 W. Irving Park Road
Number Street Suite No. (P.O. Box alone is unacceptable)
Chicago IL 60613 Cook
City ZIP Code County

Article 3. The first Board of Directors shall be 3 in number, their Names and Addresses being as follows:
Not less than three

Director Name	Street Address	City	State	ZIP Code
Alex Ogoke	1954 W. Irving park Road	Chicago	IL	60613
Ike Eziefule	1913 W. touhy Ave. #101	Chicago	IL	60626
Anayo Ukeje	1341 West Chase Ave. #101	Chicago	IL	60628

Article 4. Purposes for which the corporation is organized:

Charitable; Civic; Social Welfare and Social.

(continued on back)

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Article 4. (continued)

Is this corporation a Condominium Association as established under the Condominium Property Act? (check one)
☐ Yes ☒ No

Is this corporation a Cooperative Housing Corporation as defined in Section 216 of the Internal Revenue Code of 1954? (check one)
☐ Yes ☒ No

Is this corporation a Homeowner's Association, which administers a common-interest community as defined in subsection (c) of Section 9-102 of the Code of Civil Procedure? (check one)
☐ Yes ☒ No

Article 5. Other provisions (attach additional pages if needed):

Article 6. Names & Addresses of Incorporators

The undersigned Incorporator(s) hereby declare(s), under penalties of perjury, that the statements made in the foregoing Articles of Incorporation are true.

Dated 1/18 2006
Month & Day Year

Signatures and Names	
1.	<u><i>Alex Ochoke</i></u> Signature <u>ALEX OCHOKE</u> Name (please print)
2.	<u><i>Ike Ezietula</i></u> Signature <u>IKE EZIETULA</u> Name (please print)
3.	<u><i>Anayo Ukgie</i></u> Signature <u>ANAYO UKGIE</u> Name (please print)
4.	_____ Signature _____ Name (please print)
5.	_____ Signature _____ Name (please print)

Post Office Address	
1.	<u>1954 W. Irving Park Road</u> Street <u>Chicago</u> <u>IL</u> <u>60613</u> City/Town State ZIP
2.	<u>1913 W. Touhy Avenue, Unit 18</u> Street <u>Chicago</u> <u>IL</u> <u>60626</u> City/Town State ZIP
3.	<u>1341 W. Chase Avenue, Unit 101</u> Street <u>Chicago</u> <u>IL</u> <u>60626</u> City/Town State ZIP
4.	_____ Street _____ City/Town State ZIP
5.	_____ Street _____ City/Town State ZIP

Signatures must be in BLACK INK on the original document.

Carbon copies, photocopies or rubber stamped signatures may only be used on the duplicate copy.

- If a corporation acts as incorporator, the name of the corporation and the state of incorporation shall be shown and the execution shall be by a duly authorized corporate officer. Please print name and title under the officer's signature.
- The registered agent cannot be the corporation itself.
- The registered agent may be an individual, resident in Illinois, or a domestic or foreign corporation, authorized to act as a registered agent.
- The registered office may be, but need not be, the same as its principal office.
- A corporation that is to function as a club, as defined in Section 1-3.24 of the "Liquor Control Act" of 1934, must insert in its purpose clause a statement that it will comply with the State and local laws and ordinances relating to alcoholic liquors.

(For inserts use 8 1/2 x 11 white paper)

Printed by authority of the State of Illinois. September 2005 - 10M - C 157.14

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Exhibit “H”

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



Phil Wilson
Secretary of State

Office of the Secretary of State

The undersigned, as Secretary of State of Texas, does hereby certify that the attached is a true and correct copy of each document on file in this office as described below:

THE PEOPLES CLUB OF NIGERIA, USA
Filing Number: 157204001

Articles Of Incorporation

February 29, 2000

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on June 05, 2008.



A handwritten signature of Phil Wilson in cursive script.

Phil Wilson
Secretary of State

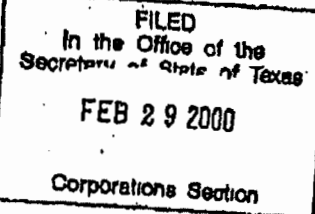
Phone: (512) 463-5555
Prepared by: SDRHOYOZ

Come visit us on the internet at <http://www.sos.state.tx.us/>
Fax: (512) 463-5709
TID: 10266

Dial: 7-1-1 for Relay Services
Document: 217804490002

Petitioners 0170

**ARTICLES OF INCORPORATION
OF
THE PEOPLES CLUB OF NIGERIA, USA
(A Non-Profit Corporation)**



ARTICLE ONE

The name of the Corporation is THE PEOPLES CLUB OF NIGERIA, USA.

ARTICLE TWO

The Corporation is a non-profit corporation

ARTICLE THREE

The period of its duration is perpetual

ARTICLE FOUR

The Corporation is organized exclusively for charitable, religious, educational, or scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code, including, but not limited to, creating a social organization

2000 FEB 29 4:20 PM

ARTICLE FIVE

The street address of its initial Registered Office, and the name of its initial Registered Agent at this address, is as follows

Uche Aloy Eze
3626 Truedale
Missouri City, Texas 77459

ARTICLE SIX

The number of initial Directors is five The names and addresses of the initial directors are

Uche Aloy Eze
3626 Truedale
Missouri City, Texas 77459

Young Ahamba
1930 Lakewinds Drive
Missouri City, Texas 77459

Emmanuel Nnabuike
3626 Truedale
Missouri City, Texas 77459

Elias Onwudiegwu
10601 Sagewind
Houston, Texas 77089

Charles Anugwom
6065 Hillcroft, Suite 411
Houston, Texas 77081

ARTICLE SEVEN

No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to its members, directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article Four hereof No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of any candidate for public office

ARTICLE EIGHT

Notwithstanding any other provision of these Articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal Income Tax under Section 501(c)(3) of the Internal Revenue Code, or the corresponding provisions of any future Federal Tax Code, or (b) by a corporation, contributions to which are deductible under Section 170 (c)(2) of the Internal Revenue Code, or the corresponding section of any future Federal Tax Code

ARTICLE NINE

Upon the Dissolution of the Corporation, assets shall be distributed for one or more exempt purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future Federal Tax Code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not so disposed of shall be disposed of by a court of competent jurisdiction of the county in which the principal office of the Corporation is then located, exclusively for such purposes or to such organization(s), as said Court shall determine, which are organized and operated for such purposes.

ARTICLE TEN

The name and address of the Incorporator is.

Marilyn S. Hershman
408 W 17th Street, Suite 101
Austin, Texas 78701-1207
(512) 474-2002

IN WITNESS WHEREOF I have hereunto set my hand this 29th day of February, 2000

Marilyn S. Hershman
Marilyn S Hershman, Incorporator

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Exhibit “I”

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
LEGAL ENTITY INFORMATION	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
CONVERTED PDF FILE(S) (1 page)	<u>\\TICRS\EXPORT16\IMAGEOUT16\861\163\86116372\xml1\FTK0003.JPG</u>
SPECIMEN DESCRIPTION	letterhead
ADDITIONAL STATEMENTS SECTION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENESS)	

(if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
DISCLAIMER	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
ATTORNEY INFORMATION	
NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
STREET	344 Maple Ave. West, Suite 151
CITY	Vienna
STATE	Virginia
COUNTRY	United States
ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
EMAIL ADDRESS	info@thetrademarkcompany.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
*NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
*STREET	344 Maple Ave. West, Suite 151
*CITY	Vienna
*STATE (Required for U.S. applicants)	Virginia
*COUNTRY	United States
*ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
*EMAIL ADDRESS	info@thetrademarkcompany.com
*AUTHORIZED TO COMMUNICATE VIA	Yes

EMAIL	
FEE INFORMATION	
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
* SIGNATURE	/Matthew H. Swyers/
* SIGNATORY'S NAME	Matthew H. Swyers
* SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

To the Commissioner for Trademarks:

MARK: PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see mark)

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL.

The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

16 Wright St.

Edison, New Jersey 08820

United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

Original PDF file:

SPE0-9767147154-131702076 . filename-1.pdf

Converted PDF file(s) (1 page)

Specimen File1

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.
The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
1-800-906-8626(phone)
1-877-351-5480(fax)
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

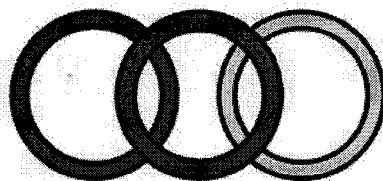
Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013
Signatory's Name: Matthew H. Swyers
Signatory's Position: Attorney of Record

RAM Sale Number: 86116372
RAM Accounting Date: 11/12/2013

Serial Number: 86116372
Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

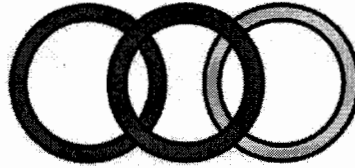
TEAS Stamp: USPTO/FTK-97.67.147.154-2013111213305958
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1f4d52aace41fabb3697176beel1fa13d447ba9ba
-CC-21819-20131112131702076350

PEOPLES CLUB OF NIGERIA INTERNATIONAL



PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA
REGISTERED IN UNITED STATES
REGISTERED IN UNITED KINGDOM
REGISTERED IN CANADA



USA Address

16 Wright Street
Edison, NJ 08820

Chief F.A. Onwuachu
Chairman, Management Committee
Ichie P.D.C. Okechukwu
General Secretary, Management Committee

Headquarters

Onitsha/Owerrie Road
P.O. Box 5421
Onitsha, Anambra State
NIGERIA

USA Branches

Houston
Washington, DC
Miami
Princeton
Galveston
Dallas/Fort Worth
Boston
Philadelphia
Atlanta
New York
Cherry Hill
San Francisco
Princeton Junction
Chicago
Arlington
New Haven
Los Angeles
San Antonio
Virginia Beach
Austin Texas

Canada

Toronto Branch

United Kingdom

London Branch

*Info The Trademark Company.com
ATTN: NEW MARK DESIGN*

Governing Council: HRH Igwe P.C. Ezenwa, Chairman

E

X

H

I

B

I

T

J

Exhibit “J”



**UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)
OFFICE ACTION (OFFICIAL LETTER) ABOUT APPLICANT'S TRADEMARK APPLICATION**

U.S. APPLICATION SERIAL NO. 86116372

MARK: PEOPLES CLUB OF NIGERIA

86116372

CORRESPONDENT ADDRESS:
MATTHEW H. SWYERS, ESQ.
THE TRADEMARK COMPANY
344 MAPLE AVE W STE 151
VIENNA, VA 22180-5612

CLICK HERE TO RESPOND TO
<http://www.uspto.gov/trademarks/teas/r>

APPLICANT: Peoples Club of Nigeria International

CORRESPONDENT'S REFERENCE/DOCKET NO :
N/A

CORRESPONDENT E-MAIL ADDRESS:
info@thetrademarkcompany.com

OFFICE ACTION

STRICT DEADLINE TO RESPOND TO THIS LETTER

TO AVOID ABANDONMENT OF APPLICANT'S TRADEMARK APPLICATION, THE USPTO MUST RECEIVE APPLICANT'S COMPLETE RESPONSE TO THIS LETTER **WITHIN 6 MONTHS** OF THE ISSUE/MAILING DATE BELOW.

ISSUE/MAILING DATE: 2/27/2014

The referenced application has been reviewed by the assigned trademark examining attorney. Applicant must respond timely and completely to the issue(s) below. 15 U.S.C. §1062(b); 37 C.F.R. §§2.62(a), 2.65(a); TMEP §§711, 718.03.

SEARCH RESULTS

The trademark examining attorney has searched the Office's database of registered and pending marks and has found no conflicting marks that would bar registration under Trademark Act Section 2(d). TMEP §704.02; *see* 15 U.S.C. §1052(d).

SUMMARY OF ISSUES that applicant must address:

- Specimen Requirement
- Disclaimer Requirement
- Clarification of Entity Information Requirement

SPECIMEN REQUIREMENT

The specimen is not acceptable because the mark on the drawing differs from the mark on the specimen, and because it fails to create an association between the applied-for mark and the identified services.

Mark Differs on Drawing and Specimen

Registration is refused because the specimen does not show the applied-for mark in the drawing in use in commerce. 15 U.S.C. §§1051, 1127; 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a). Specifically, the specimen displays the mark as PEOPLES CLUB OF NIGERIA INTERNATIONAL, followed by four lines of text and then a design of three interlocking rings; however, the drawing displays the mark as PEOPLES CLUB OF NIGERIA INTERNATIONAL immediately above the design of the three interlocking rings.

The drawing shows the mark sought to be registered, and must be a substantially exact representation of the mark as used on or in connection with the goods and/or services, as shown by the specimen. 37 C.F.R. §2.51(a); TMEP §807.12(a). Because the mark in the drawing is not a substantially exact representation of the mark on the specimen, applicant has failed to provide the required evidence of use of the applied-for mark in commerce on or in connection with applicant's goods and/or services. *See* TMEP §807.12(a).

An application based on Trademark Act Section 1(a) must include a specimen showing the applied-for mark in use in commerce for each international class of goods and/or services identified in the application or amendment to allege use. 15 U.S.C. §1051(a)(1); 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a).

Regarding whether applicant may submit an amended drawing in response to this refusal, applicant is advised that the drawing of a mark can be amended only if the amendment does not materially alter the mark as originally filed. 37 C.F.R. §2.72(a)(2); *see* TMEP §§807.12(a), 807.14 *et seq.* In this case, amending the mark in the drawing to conform to the mark on the specimen would be a material alteration and would not be accepted, because the difference between the mark in the specimen and the drawing is significant and each mark creates a different commercial impression. Specifically, the commercial

impression of the mark on the specimen and the mark in the drawing differ because of the additional four lines of text that appear on the specimen between the literal element and the design element of the applied-for mark.

Specimen Does Not Create Association Between Mark and Services

Registration is also refused because the specimen does not show a direct association between the applied-for mark and the identified services; thus the specimen fails to show the applied-for mark in use in commerce. 15 U.S.C. §§1051, 1127; 37 C.F.R. §§2.34(a)(1)(iv), 2.56(a); TMEP §§904, 904.07(a).

Specimens consisting of advertising or promotional materials generally must show a direct association between the mark and the services for which registration is sought. *See In re Universal Oil Prods. Co.*, 476 F.2d 653, 655, 177 USPQ 456, 457 (C.C.P.A. 1973); *In re HSB Solomon Assocs.*, 102 USPQ2d 1269, 1274 (TTAB 2012); TMEP §1301.04(b). While the exact nature of the services does not need to be specified in the specimen, there must be something which creates in the mind of the purchaser an association between the mark and the service. *In re Adair*, 45 USPQ2d 1211, 1215 (TTAB 1997) (quoting *In re Johnson Controls Inc.*, 33 USPQ2d 1318, 1320 (TTAB 1994)); *see In re Osmotica Holdings, Corp.*, 95 USPQ2d 1666, 1668 (TTAB 2010).

In the present case, the specimen is a piece of letterhead that has the applied-for mark at the top, addresses for applicant's headquarters, and a listing of applicant's various branches. The specimen makes no reference – general or otherwise – to applicant's social club services. Letterhead that bears only the mark and a company name and address are not adequate specimens (unless the mark itself has a descriptive portion that refers to the service), because they do not show that the mark is used in the sale or advertising of the particular services recited in the application. *In re Monograms America, Inc.*, 51 USPQ2d 1317 (TTAB 1999) (letterhead specimen showing the mark MONOGRAMS AMERICA and the wording “A Nationwide Network of Embroidery Stores” held insufficient to support registration for consulting services for embroidery stores). TMEP §1301.04(c).

Examples of specimens for services may include advertising and marketing materials, brochures, photographs of business signage and billboards, and website printouts that show the mark used in the actual sale, rendering, or advertising of the services. *See* TMEP §§1301.04 *et seq.*

Applicant may respond to the specimen refusal by satisfying one of the following:

- (1) Submit a different specimen (a verified “substitute” specimen) that (a) was in actual use in commerce at least as early as the filing date of the application or prior to the filing of an amendment to allege use and (b) shows the applied-for mark in actual use in commerce for the goods and/or services identified in the application.
- (2) Amend the filing basis to intent to use under Section 1(b), for which no specimen is required. This option will later necessitate additional fee(s) and filing requirements such as providing a specimen at a subsequent date.

For an overview of *both* response options referenced above and instructions on how to satisfy either option online using the Trademark Electronic Application System (TEAS) form, please go to http://www.uspto.gov/trademarks/law/J3_1.jsp.

To submit a verified specimen online using the Trademark Electronic Application System (TEAS),

applicant should do the following: (1) answer “yes” to the TEAS response form wizard question to “submit a new or substitute specimen,” (2) attach a jpg or pdf file of the specimen, (3) describe what the specimen consists of, and (4) select the statement that “The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application.” These steps appear on different pages of the TEAS response form.

DISCLAIMER REQUIREMENT

Applicant must disclaim the descriptive wording “CLUB OF NIGERIA INTERNATIONAL” apart from the mark as shown because it merely describes an ingredient, quality, characteristic, function, feature, purpose, or use of applicant’s goods and/or services. *See* 15 U.S.C. §§1052(e)(1), 1056(a); *DuoProSS Meditech Corp. v. Inviro Med. Devices, Ltd.*, 695 F.3d 1247, 1251, 103 USPQ2d 1753, 1755 (Fed. Cir. 2012) (quoting *In re Oppedahl & Larson LLP*, 373 F.3d 1171, 1173, 71 USPQ2d 1370, 1371 (Fed. Cir. 2004)); *In re Steelbuilding.com*, 415 F.3d 1293, 1297, 75 USPQ2d 1420, 1421 (Fed. Cir. 2005); TMEP §§1213, 1213.03(a).

In the application, applicant voluntarily disclaimed NIGERIA. However, applicant must also disclaim CLUB and INTERNATIONAL. “Club” is defined in relevant part as an organization for people who have a common interest in a particular activity or subject. *See* the attached evidence from Macmillan Dictionary. Applicant’s identified services are social club services, and, as shown by the attached screenshot from applicant’s website, applicant provides a club to unite Nigerians for social interaction. Therefore, the wording merely describes features or the purpose of applicant’s services. In addition, the wording “International” is simply a business designation that serves no source-identifying function. Business entity designations such as “Corporation,” “Inc.,” “Company,” and “Ltd.” merely indicate applicant’s entity type and generally do not function to indicate the source of goods or services. *see, e.g., Goodyear’s India Rubber Glove Mfg. Co. v. Goodyear Rubber Co.*, 128 U.S. 598, 602-03 (1888); *In re Patent & Trademark Servs., Inc.*, 49 USPQ2d 1537, 1539-40 (TTAB 1998); *In re The Paint Prods. Co.*, 8 USPQ2d 1863, 1866 (TTAB 1988). “International” means a company or organization that exists, works, or has members in more than one country. *See* the attached evidence from Macmillan Dictionary. Thus, consumers will not attribute a source indicating function to the wording INTERNATIONAL, but rather they will view it as identifying the nature of applicant’s business entity. Applicant may submit the following standardized format for a disclaimer:

No claim is made to the exclusive right to use “CLUB OF NIGERIA INTERNATIONAL” apart from the mark as shown.

TMEP §1213.08(a)(i); *see In re Owatonna Tool Co.*, 231 USPQ 493 (Comm’r Pats. 1983).

A “disclaimer” is a statement in the application record that applicant does not claim exclusive rights to an unregistrable component of a mark; a disclaimer of unregistrable matter does not affect the appearance of the mark or physically remove disclaimed matter from the mark. *See Schwarzkopf v. John H. Breck, Inc.*, 340 F.2d 978, 978, 144 USPQ 433, 433 (C.C.P.A. 1965); TMEP §1213. An unregistrable component of a mark includes wording and designs that are merely descriptive of an applicant’s goods and/or services. 15 U.S.C. §1052(e); *see* TMEP §§1209.03(f), 1213.03 *et seq.* Such words or designs need to be freely available for other businesses to market comparable goods or services and should not become the proprietary domain of any one party. *See Dena Corp. v. Belvedere Int’l, Inc.*, 950 F.2d 1555, 1560, 21 USPQ2d 1047, 1051 (Fed. Cir. 1991); *In re Aug. Storck KG*, 218 USPQ 823, 825 (TTAB 1983).

If applicant does not provide the required disclaimer, the USPTO may refuse to register the entire mark. *See In re Stereotaxis Inc.*, 429 F.3d 1039, 1041, 77 USPQ2d 1087, 1089 (Fed. Cir. 2005); TMEP §1213.01(b).

CLARIFICATION OF ENTITY INFORMATION REQUIREMENT

In the application, applicant identified its legal entity as an “association” organized in Nigeria. In addition to specifying the country under whose laws it is organized or exists, applicant must also indicate whether the association is incorporated or unincorporated. TMEP §803.03(c).

ASSISTANCE

If applicant has questions regarding this Office action, please telephone or e-mail the assigned trademark examining attorney. All relevant e-mail communications will be placed in the official application record; however, an e-mail communication will not be accepted as a response to this Office action and will not extend the deadline for filing a proper response. *See* 37 C.F.R. §2.191; TMEP §§304.01-.02, 709.04-.05. Further, although the trademark examining attorney may provide additional explanation pertaining to the refusal(s) and/or requirement(s) in this Office action, the trademark examining attorney may not provide legal advice or statements about applicant’s rights. *See* TMEP §§705.02, 709.06.

TEAS PLUS APPLICANTS MUST SUBMIT DOCUMENTS ELECTRONICALLY OR SUBMIT FEE: Applicants who filed their application online using the reduced-fee TEAS Plus application must continue to submit certain documents online using TEAS, including responses to Office actions. *See* 37 C.F.R. §2.23(a)(1). For a complete list of these documents, see TMEP §819.02(b). In addition, such applicants must accept correspondence from the Office via e-mail throughout the examination process and must maintain a valid e-mail address. 37 C.F.R. §2.23(a)(2); TMEP §§819, 819.02(a). TEAS Plus applicants who do not meet these requirements must submit an additional fee of \$50 per international class of goods and/or services. 37 C.F.R. §2.6(a)(1)(iv); TMEP §819.04. In appropriate situations and where all issues can be resolved by amendment, responding by telephone to authorize an examiner’s amendment will not incur this additional fee.

/Meredith Maresca/
Trademark Examining Attorney
Law Office 109
(571) 272-8985
meredith.maresca@uspto.gov

TO RESPOND TO THIS LETTER: Go to http://www.uspto.gov/trademarks/teas/response_forms.jsp. Please wait 48-72 hours from the issue/ mailing date before using the Trademark Electronic Application System (TEAS), to allow for necessary system updates of the application. For *technical* assistance with online forms, e-mail TEAS@uspto.gov. For questions about the Office action itself, please contact the assigned trademark examining attorney. **E-mail communications will not be accepted as responses to Office actions; therefore, do not respond to this Office action by e-mail.**

All informal e-mail communications relevant to this application will be placed in the official application record.

WHO MUST SIGN THE RESPONSE: It must be personally signed by an individual applicant or someone with legal authority to bind an applicant (i.e., a corporate officer, a general partner, all joint applicants). If an applicant is represented by an attorney, the attorney must sign the response.

PERIODICALLY CHECK THE STATUS OF THE APPLICATION: To ensure that applicant does not miss crucial deadlines or official notices, check the status of the application every three to four months using the Trademark Status and Document Retrieval (TSDR) system at <http://tsdr.uspto.gov/>. Please keep a copy of the TSDR status screen. If the status shows no change for more than six months, contact the Trademark Assistance Center by e-mail at TrademarkAssistanceCenter@uspto.gov or call 1-800-786-9199. For more information on checking status, see <http://www.uspto.gov/trademarks/process/status/>.

TO UPDATE CORRESPONDENCE/E-MAIL ADDRESS: Use the TEAS form at <http://www.uspto.gov/trademarks/teas/correspondence.jsp>.

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Did you know?
Click any word in a
definition or example to
find the entry for that

club - definition

Show less

★★★

NOON (COUNTABLE) [Pronunciation](#) /klʌb/ [Word Forms](#)

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Menu

- [society for activity](#)
 - [place for entertainment](#)
 - [sports players and staff](#)
 - [place to relax](#)
 - [for buying at low price](#)
 - [suit of playing cards](#)
 - [for hitting ball in golf](#)
 - [stick used as weapon](#)
- [+phrase](#)

Related dictionary definitions

club VERB
book club NOON
club soda NOON
fan club NOON
golf club NOON
billy club NOON
club class NOON

- an organization for people who have a common interest in a particular activity or subject
a sailing club
join a club: *I've joined the chess club.*
member of a club: *Have you thought about becoming a member of our model airplane club?*
belong to a club: *We both belong to the local tennis club.*

[Thesaurus entry for this meaning of club](#)

- the place where the members of a club meet
We go to the club at least once a week.
[Thesaurus entry for this meaning of club](#)
- the people who belong to a club
The whole club is invited to their wedding.
[Thesaurus entry for this meaning of club](#)

word




- 2 a place you go to in the evening for entertainment
A new comedy club has opened downtown.
This is an exclusive club for members only.
[i] Thesaurus entry for this meaning of club
 - a. a place you go to in the evening to dance and drink
[i] Thesaurus entry for this meaning of club
- 3 a team of sports players and the staff who work with them
the Waterville baseball club
a soccer club
[i] Thesaurus entry for this meaning of club
- 4 an organization that provides a place where its members, especially men, can go and eat, relax, or stay
a gentleman's club
[i] Thesaurus entry for this meaning of club
- 5 an organization that you join in order to buy something such as books or CDs that are sent to you by mail
[i] Thesaurus entry for this meaning of club
- 6 a playing card with a pattern like three black balls on a black stem on it
[i] Thesaurus entry for this meaning of club
 - a. **clubs** [PLURAL] the suit (=group) of playing cards that have a pattern like three black balls on a black stem on them. The other suits are diamonds, hearts, and spades
the king of clubs
[i] Thesaurus entry for this meaning of club
- 7 an object used for hitting the ball in golf
[i] Thesaurus entry for this meaning of club
- 8 a thick heavy stick used as a weapon
[i] Thesaurus entry for this meaning of club

PHRASE




- **welcome to/join the club** SPOKEN
used for telling someone that you understand an unpleasant situation they are in, because you are in the same situation
"I feel completely let down." "Join the club."
[i] Thesaurus entry for this meaning of club

This is the American English definition of club. [View British English definition of club.](#)
[Change your default dictionary and thesaurus to British English.](#)
[View the pronunciation for club.](#)




[HOVER TO EXPAND →](#)

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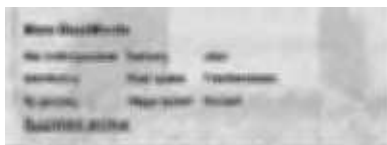


BuzzWord

sinkhole

a large, circular hole in the ground which suddenly appears because rock below has gradually been damaged or dissolved by water as it passes through the ground

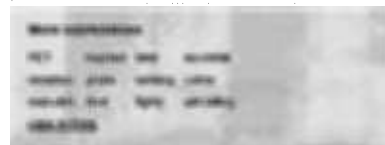
[BuzzWord Article](#)



Open Dictionary

executrix

a woman who is chosen by a person to execute his/her will
[add a word](#)



Word of the Day

contrite

very sorry or ashamed because you have done something bad

Blog

A must for anyone with an interest in the changing face of language. The Macmillan Dictionary blog explores English as it is spoken around the world today.

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American definitions of words from the online English dictionary from Macmillan Publishers Limited.



PEOPLES CLUB OF NIGERIA INTERNATIONAL



OFFICIAL WEB SITE

UNITY, LOVE & SERVICE

INTERNATIONAL HEADQUARTERS
ONITSHA - OWERRI RD
ONITSHA, ANAMBRA STATE
NIGERIA



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Mini Calendar

Feb 2014

About Peoples Club of Nigeria International

Peoples club was formed in 1971 in Aba (Abia state of Nigeria) by a small group of individuals led by Chief Titus I. Ume-Ezeoke of blessed memory. It was a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. It was formed with the spirit of uniting people of like-minds, for social interaction. It was timely and it was well received because of it's founding principle of "be your brother's Keeper" embodied in it's motto: unity,love & Service
Continue Reading >>>>



MEMBERS LOG-IN

Spotlight



PCNI DISCUSSION



YAHOO! GROUPS

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PCNI MEMBERS ONLY

Asaba Convention 19...
(2011/1/31)



Asaba Convention 19...





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Design by

PCNI Business

Listings

■ Host maker Inc
(2011/1/24)

Top Classifieds

Listings

►► **Polls**

How do you like our new website?

C Excellent!

Cool

✓ Hmm..not bad

What the hell is this?

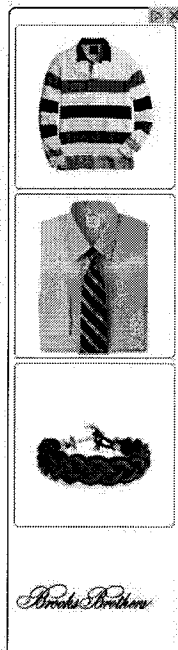
	Votes	Results
Yes	60	75%
No	20	25%





Dictionary Thesaurus Search

MACMILLAN DICTIONARY



international - definition

Show less

NOUN (COUNTABLE) Pronunciation /ˌɪntərˈnæʃən(ə)l/ Word Forms

[View thesaurus entry for international](#)
[What are red words?](#)
[Using the thesaurus](#)

- 1 a sports game between players or teams from different countries
[Thesaurus entry for this meaning of international](#)
 - a. someone who plays in an international sports game
[Thesaurus entry for this meaning of international](#)
- 2 a company or organization that exists, works, or has members in more than one country
[Thesaurus entry for this meaning of international](#)

Related dictionary definitions

international ADJECTIVE
Amnesty International
international relations NOUN
international baccalaureate NOUN
the international community NOUN
the international date line NOUN

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Click any word in a definition or example to find the entry for that word



learn English



live English



love English

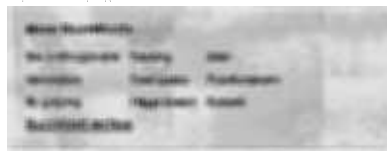


BuzzWord

sinkhole

a large, circular hole in the ground which suddenly appears because rock below has gradually been damaged or dissolved by water as it passes through the ground

[BuzzWord Article](#)

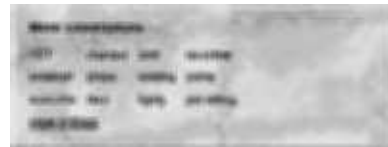


Open Dictionary

executrix

a woman who is chosen by a person to execute his/her will

[add a word](#)



Blog

A must for anyone with an interest in the changing face of language. The Macmillan Dictionary blog explores English as it is spoken around the world today.

[global English and language change from our blog](#)

Word of the Day

contrite

very sorry or ashamed because you have done something bad

American definition of international from the online English dictionary from Macmillan Publishers Limited.



To: Peoples Club of Nigeria International (info@thetrademarkcompany.com)
Subject: U.S. TRADEMARK APPLICATION NO. 86116372 - PEOPLES CLUB OF NIGERIA - N/A
Sent: 2/27/2014 4:46:06 PM
Sent As: ECOM109@USPTO.GOV
Attachments:

UNITED STATES PATENT AND TRADEMARK OFFICE (USPTO)

**IMPORTANT NOTICE REGARDING YOUR
U.S. TRADEMARK APPLICATION**

USPTO OFFICE ACTION (OFFICIAL LETTER) HAS ISSUED
ON **2/27/2014** FOR U.S. APPLICATION SERIAL NO. 86116372

Please follow the instructions below:

(1) TO READ THE LETTER: Click on this [link](#) or go to <http://tsdr.uspto.gov>, enter the U.S. application serial number, and click on "Documents."

The Office action may not be immediately viewable, to allow for necessary system updates of the application, but will be available within 24 hours of this e-mail notification.

(2) TIMELY RESPONSE IS REQUIRED: Please carefully review the Office action to determine (1) how to respond, and (2) the applicable response time period. Your response deadline will be calculated from **2/27/2014** (*or sooner if specified in the Office action*). For information regarding response time periods, see <http://www.uspto.gov/trademarks/process/status/responsetime.jsp>.

Do NOT hit "Reply" to this e-mail notification, or otherwise e-mail your response because the USPTO does NOT accept e-mails as responses to Office actions. Instead, the USPTO recommends that you respond online using the Trademark Electronic Application System (TEAS) response form located at http://www.uspto.gov/trademarks/teas/response_forms.jsp.

(3) QUESTIONS: For questions about the contents of the Office action itself, please contact the assigned trademark examining attorney. For *technical* assistance in accessing or viewing the Office action in the Trademark Status and Document Retrieval (TSDR) system, please e-mail TSDR@uspto.gov.

WARNING

Failure to file the required response by the applicable response deadline will result in the

ABANDONMENT of your application. For more information regarding abandonment, see <http://www.uspto.gov/trademarks/basics/abandon.jsp>.

PRIVATE COMPANY SOLICITATIONS REGARDING YOUR APPLICATION: Private companies **not** associated with the USPTO are using information provided in trademark applications to mail or e-mail trademark-related solicitations. These companies often use names that closely resemble the USPTO and their solicitations may look like an official government document. Many solicitations require that you pay “fees.”

Please carefully review all correspondence you receive regarding this application to make sure that you are responding to an official document from the USPTO rather than a private company solicitation. All official USPTO correspondence will be mailed only from the “United States Patent and Trademark Office” in Alexandria, VA; or sent by e-mail from the domain “@uspto.gov.” For more information on how to handle private company solicitations, see http://www.uspto.gov/trademarks/solicitation_warnings.jsp.

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Exhibit “K”

Response to Office Action

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	86116372
LAW OFFICE ASSIGNED	LAW OFFICE 109
MARK SECTION (no change)	
LEGAL ENTITY SECTION (current)	
TYPE	association
STATE/COUNTRY WHERE LEGALLY ORGANIZED	NG
LEGAL ENTITY SECTION (proposed)	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nigeria
GOODS AND/OR SERVICES SECTION (current)	
INTERNATIONAL CLASS	041
DESCRIPTION	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
GOODS AND/OR SERVICES SECTION (proposed)	
INTERNATIONAL CLASS	041
DESCRIPTION	
Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members	
FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994

STATEMENT TYPE	"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use" [for an application based on Section 1(b) Intent-to-Use].
SPECIMEN FILE NAME(S)	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml6\ ROA0002.JPG
SPECIMEN DESCRIPTION	Flier advertising club
ADDITIONAL STATEMENTS SECTION	
DISCLAIMER	No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.
SIGNATURE SECTION	
DECLARATION SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
RESPONSE SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
AUTHORIZED SIGNATORY	YES
FILING INFORMATION SECTION	
SUBMIT DATE	Wed Apr 09 15:13:46 EDT 2014
TEAS STAMP	USPTO/ROA-97.67.147.154-2 0140409151346993964-86116 372-50078b2aafcd15404828 5f90e0a9aa26be0ce2d749d8b 0212a8aab199f2264d8-N/A-N /A-20140409150801932050

Response to Office Action
To the Commissioner for Trademarks:

Application serial no. **86116372** has been amended as follows:

CLASSIFICATION AND LISTING OF GOODS/SERVICES

Applicant proposes to amend the following class of goods/services in the application:

Current: Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Original Filing Basis:

Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Proposed: Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Applicant hereby submits one(or more) specimen(s) for Class 041. The specimen(s) submitted consists of Flier advertising club.

"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application"*[for an application based on Section 1(a), Use in Commerce]* OR **"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use"**

[for an application based on Section 1(b) Intent-to-Use].

Specimen File1

APPLICANT AND/OR ENTITY INFORMATION

Applicant proposes to amend the following:

Current: Peoples Club of Nigeria International a(n) association, legally organized under the laws of NG, having an address of

16 Wright St.
Edison, New Jersey 08820
United States

Proposed: Peoples Club of Nigeria International, a corporation of Nigeria, having an address of
16 Wright St.

Edison, New Jersey 08820
United States

ADDITIONAL STATEMENTS

Disclaimer

No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.

SIGNATURE(S)

Declaration Signature

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or amendment to allege use (AAU) unsigned, all statements in the application or AAU and this submission based on the signatory's own knowledge are true, and all statements in the application or AAU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AAU: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(a) or AAU under 15 U.S.C. Section 1051(c), the signatory additionally believes that: the applicant is the owner of the trademark/service mark sought to be registered; the applicant or the applicant's related company or licensee is using the mark in commerce and has been using the mark in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the signatory additionally believes that: the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention and has had a bona fide intention as of the application filing date to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the goods/services in the application; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

Signature: /Matthew H. Swyers/ Date: 04/09/2014
Signatory's Name: Matthew H. Swyers
Signatory's Position: Attorney of Record
Signatory's Phone Number: 800-906-8626 x100

Response Signature

Signature: /Matthew H. Swyers/ Date: 04/09/2014

Signatory's Name: Matthew H. Swyers
Signatory's Position: Attorney of Record

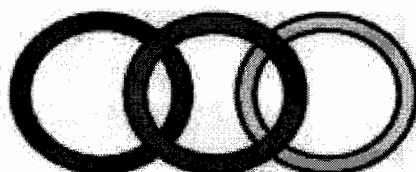
Signatory's Phone Number: 800-906-8626 x100

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the applicant's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the applicant in this matter: (1) the applicant has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the applicant has filed a power of attorney appointing him/her in this matter; or (4) the applicant's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

Serial Number: 86116372
Internet Transmission Date: Wed Apr 09 15:13:46 EDT 2014
TEAS Stamp: USPTO/ROA-97.67.147.154-2014040915134699
3964-86116372-50078b2aafcd154048285f90e
0a9aa26be0ce2d749d8b0212a8aab199f2264d8-
N/A-N/A-20140409150801932050

PEOPLES CLUB OF NIGERIA INTERNATIONAL

USA Address
16 Wright Street
Edison, NJ 08820



Headquarters
Onitsha/Owerrie Road
P.O. Box 5421
Onitsha, Anambra State
NIGERIA

USA Branches

Houston
Washington, DC
Princeton
Galveston
Dallas/ Fort Worth
Boston
Philadelphia
Atlanta
New York
Cherry Hill
San Francisco
Arlington
New Haven
Los Angeles
San Antonio
Virginia Beach
Austin Texas

*Motto : Unity, Love, Service
A Social Club*

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Exhibit “L”

United States of America

United States Patent and Trademark Office

PEOPLES CLUB OF NIGERIA INTERNATIONAL



Reg. No. 4,591,874

Registered Aug. 26, 2014

Int. Cl.: 41

SERVICE MARK

PRINCIPAL REGISTER

PEOPLES CLUB OF NIGERIA INTERNATIONAL (NIGERIA CORPORATION)
16 WRIGHT ST.
EDISON, NJ 08820

FOR: SOCIAL CLUB SERVICES, NAMELY, ARRANGING, ORGANIZING, AND HOSTING
SOCIAL EVENTS, GET-TOGETHERS, AND PARTIES FOR CLUB MEMBERS, IN CLASS 41
(U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1994; IN COMMERCE 0-0-1994.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CLUB OF NIGERIA INTERNATIONAL", APART FROM THE MARK AS SHOWN.

THE COLOR(S) BLACK, BLUE, RED, AND YELLOW IS/ARE CLAIMED AS A FEATURE OF THE MARK.

THE MARK CONSISTS OF THE BLACK LETTERS "PEOPLES CLUB OF NIGERIA INTERNATIONAL" ABOVE A BLUE CIRCLE BORDERED IN BLACK LINKED TO A RED CIRCLE BORDERED IN BLACK LINKED TO A YELLOW CIRCLE BORDERED IN BLACK.

SER. NO. 86-116,372, FILED 11-12-2013.

MEREDITH MARESCA, EXAMINING ATTORNEY



Nichelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*

What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.*
See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*

What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or reminder of these filing requirements.

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

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Exhibit “M”



United States Patent and Trademark Office

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Your submission has been received by the USPTO.
The content of your submission is listed below.
You may print a copy of this receipt for your records.

ESTTA Tracking number: **ESTTA627393**Filing date: **09/16/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Petition for Cancellation

Notice is hereby given that the following parties request to cancel indicated registration.

Petitioner Information

Name	Peoples Club of Nigeria International Princeton Junction, NJ Branch, Inc.		
Entity	Corporation	Citizenship	New Jersey
Address	Post Office Box 642 Princeton Junction, NJ 08550 UNITED STATES		

Name	Peoples Club of Nigeria International-Miami Branch		
Entity	Corporation	Citizenship	Florida
Address	2530 NW 131 Street Miami, FL 33167 UNITED STATES		

Name	Peoples Club of Nigeria International-Chicago Branch		
Entity	Corporation	Citizenship	Illinois
Address	7717 Keeler Avenue Skokie, IL 60076 UNITED STATES		

Attorney information	Craig S. Hilliard Stark & Stark PC 993 Lenox Drive Bldg 2 Lawrenceville, NJ 08648 UNITED STATES chilliard@stark-stark.com Phone:6092197426
-----------------------------	---

Registration Subject to Cancellation

Registration No	4591874	Registration date	08/26/2014
Registrant	Peoples Club of Nigeria International 16 Wright St. Edison, NJ 08820 UNITED STATES		

Goods/Services Subject to Cancellation

Class 041. First Use: 1994/00/00 First Use In Commerce: 1994/00/00 All goods and services in the class are cancelled, namely: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
--

Grounds for Cancellation

<i>Torres v. Cantine Torresella S.r.l.</i> Fraud	808 F.2d 46, 1 USPQ2d 1483 (Fed. Cir. 1986)
--	---

Attachments	Ex A.pdf(33513 bytes) Ex B.pdf(64956 bytes) Ex C.pdf(20565 bytes) Petition to Cancel_Final(1).pdf(49431 bytes)
--------------------	---

Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Overnight Courier on this date.

Signature	/csh/
Name	Craig S. Hilliard

Date

09/16/2014

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Exhibit “N”

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

In the Matter of Trademark Registration No. 4,591,874
For the Mark: Peoples Club of Nigeria International Service Mark
Date registered: 08-26-2014

PEOPLES CLUB OF NIGERIA
INTERNATIONAL (PCNI),
PRINCETON JUNCTION BRANCH,
PCNI CHICAGO BRANCH, PCNI
MIAMI BRANCH,

Petitioners,

v.

PEOPLES CLUB OF NIGERIA
INTERNATIONAL, INC., A New
Jersey Corporation,

Registrant.

PETITION TO CANCEL

The Petitioners are:

Peoples Club of Nigeria International – Princeton Junction Branch
Post Office Box 642
Princeton Junction, New Jersey 08550

Peoples Club of Nigeria International—Miami Branch
2530 NW 131 Street
Miami, Florida 33167

Peoples Club of Nigeria International—Chicago Branch
7717 Keeler Avenue
Skokie, Illinois 60076

To the best of Petitioners' knowledge, the name and address of the current owner of the registration is:

Peoples Club of Nigeria International, Inc.
16 Wright Street
Edison, New Jersey 08820

Petitioners believe that they will be damaged by the above-identified registration, and hereby petition to cancel the same.

PARTIES

1. Petitioner, Peoples Club of Nigeria International—Princeton Junction Branch, is a New Jersey Corporation located at Post Office Box 642, Princeton Junction, New Jersey 08550.
2. Petitioner, Peoples Club of Nigeria International—Miami Branch, is located at 2530 NW 131 Street, Miami, Florida 33167.
3. Petitioner, Peoples Club of Nigeria International—Chicago Branch, is located at 7717 Keeler Avenue, Skokie, Illinois 60076.
4. Petitioners are represented by Craig S. Hilliard, Esq., Stark & Stark, P.C., 993 Lenox Drive, Lawrenceville, New Jersey 08648.
5. Registrant, Peoples Club of Nigeria International, Inc. ("PCNI" or "Registrant"), is a New Jersey corporation located at 16 Wright Street, Edison, New Jersey 08820.
6. Registrant is represented by Matthew H. Swyers, Esq., The Trademark Company, 344 Maple Ave. West, Suite 151, Vienna, Virginia 22180.

FACTS

7. Registrant filed a Certification of Incorporation with the State of New Jersey on August 18, 2010. See Ex. "A."

8. Petitioner, PCNI Princeton Junction Branch, filed a Certification of Incorporation with the State of New Jersey on December 4, 2006. See Ex. “B.”
9. On November 12, 2013, Registrant filed an application with the United States Patent and Trademark Office (“USPTO”) to register a service mark that consisted of the words “Peoples Club of Nigeria International” with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
10. In the trademark application, the Registrant declared under oath that it “believe[d] the applicant to be the owner of the trademark/service mark sought to be registered....”
11. Additionally, in the trademark application, the Registrant declared under oath that “to the best of [its] knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce....”
12. The Registrant attached a sample PCNI letterhead to the trademark application. On that document the words “Info@thetrademarkcompany.com” and “Attn: New Mark Design” were scrolled in handwritten writing. Notably, the Princeton Junction branch, Miami branch, Chicago branch and 17 other branches were listed as USA branches on the letterhead.
13. On February 27, 2014, the USPTO issued an Office Action in response to the Registrant’s application.
14. In that Office Action, the USPTO sought clarification of the entity information requirement. The USPTO stated, “In the application, applicant identified its legal entity as an ‘association’ organized in Nigeria. In addition to specifying the country

under whose laws it is organized or exists, applicant must also indicate whether the association is incorporated or unincorporated.”

15. On April 9, 2014, the Registrant filed a Response to the Office Action. In that Response, the Registrant attached another PCNI letterhead. The Registrant represented that the letterhead was a specimen of the Mark in use as of the date of the filing of the application. Prominently displayed along the top of that letterhead was a detailed listing of various “USA Branches.” Notably, the Princeton Junction branch was not present on this letterhead. Nor were the Miami and Chicago branches listed.
16. There is a current dispute within PCNI between the Petitioners and Registrant. The split has created two primary groups.
17. The first group is the Pentagons, also known as the Leadership Core Group. The Registrant is affiliated with this group.
18. The second group is the Progressives. The Progressives consist of the Petitioner branches.¹
19. The Registrant and its affiliates (i.e. the Leadership Core Group or Pentagons) consider the Petitioners (i.e. the Progressives) illegitimate.
20. By a “Public Notice” dated July 17, 2014, the Registrant stated that it had retained trademark attorneys to enforce its registered trademark. See Ex. “C.”
21. Notably, in the Response to Office Action, the Registrant indicated that PCNI was a “corporation” incorporated in “Nigeria.”

¹ The following branches are also part of the Progressive group: PCNI Houston, PCNI Washington D.C., PCNI New York, PCNI Cherry Hill, PCNI San Francisco, PCNI San Antonio, and PCNI Toronto.

22. The Service Mark was registered on August 26, 2014, under Registration No. 4,591,874.

GROUND FOR CANCELLATION

23. Petitioner repeats and realleges all of the foregoing allegations as if repeated verbatim herein.

24. Registrant committed fraud on the USPTO in stating under oath in its application that Registrant had an exclusive right to use the Mark. Registrant purposefully removed some of the Petitioners from the PCNI letterhead prior to submitting its Response to Office Action on April 9, 2014. Registrant now claims exclusive use of the registered Mark, fails to recognize Petitioners' lawful and long-standing right to use the Mark and threatens to initiate litigation to prevent Petitioners' use of the Mark.

25. Registrant committed fraud on the USPTO in stating under oath in its application that Registrant was a Nigerian corporation. In fact, Registrant is a New Jersey corporation. See Ex. "A."

26. Petitioners, along with all other USA branches of PCNI, have long used the Mark recently registered with the USPTO.

27. Registrant committed fraud by not disclosing to the USPTO that the two factions in each USA branch (the Progressives and the Pentagons) have used the Mark lawfully for many years. Petitioners have used the Mark since inception of their respective branches.

28. Registrant failed to inform the USPTO of its plan to use the Mark for the exclusive benefit of the Pentagon faction. The Registrant deliberately failed to inform the USPTO that the Petitioners had used the Mark in the past.

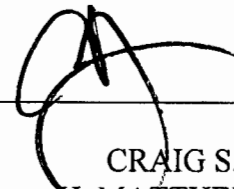
CONCLUSION

For the reasons expressed herein, Petitioners believe that the registration was fraudulently obtained and that the trademark application and subsequent submissions were less than complete. As such, Petitioners respectfully request that the registration be cancelled and for such other relief as appropriate.

Respectfully submitted,

Stark & Stark
A Professional Corporation

By: _____



CRAIG S. HILLIARD
~~N. MATTHEW TAYLOR~~
993 Lenox Drive, Bldg. 2
Lawrenceville, NJ 08648
(609) 895-7346
Attorneys for Petitioner

Date: _____

9/16/14

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STATE OF NEW JERSEY
DEPARTMENT OF THE TREASURY
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL, INC.
0101010702

*I, the Treasurer of the State of New Jersey,
do hereby certify, that the above named business
did file and record in this department a
Certificate of Incorporation on August 18th, 2010
and that the attached is a true copy of this
document as the same is taken from and compared
with the original(s) filed in this office and now
remaining on file and of record.*



Certificate Number: 117988876

Verify this certificate online at

https://www1.state.nj.us/TYTR_StandingCerti/JSP/Verify_Cert.jsp

*IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
my Official Seal at Trenton, this
19th day of August, 2010*

A handwritten signature in black ink, appearing to read "Andrew P. Sidamon-Eristoff".

Andrew P Sidamon-Eristoff
State Treasurer

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STATE OF NEW JERSEY
DEPARTMENT OF TREASURY
FILING CERTIFICATION (CERTIFIED COPY)

PEOPLE'S CLUB OF NIGERIA INTERNATIONAL
PRINCETON JUNCTION, NJ BRANCH INC.

0100972745

*I, the Treasurer of the State of New Jersey,
do hereby certify, that the above named business
did file and record in this department a
Certificate of Incorporation on December 4th, 2006
and that the attached is a true copy of this
document as the same is taken from and compared
with the original(s) filed in this office and now
remaining on file and of record.*

IN TESTIMONY WHEREOF, I have
hereunto set my hand and
affixed my Official Seal
at Trenton, this
19th day of December, 2006



Bradley Abelow

Bradley Abelow
State Treasurer

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July 17, 2014

To: ALL PCNI BRANCHES
ALL MEMBERS OF PCNI
MEMBERS OF GENERAL PUBLIC

Re: Un-authorized use of the name of Peoples Club of Nigeria International posted by Chief Sam C. Iwuchukwu and Hon Alhaji A. N. Obinwa dated 16th July, 2014.

Chief Iwuchukwu and Alhaji Obinwa in a signed statement posted the following on the internet:

"To be clear, Peoples Club of Nigeria International and Club Trademark Design registered in New Jersey USA under the President Emeritus and Patron Trustee Elect, Chief Fabian Onwuachu regime, belongs to all PCNI members... Thus, any legal action instituted by any person on the Trademark Design #86116372 shall be met by a counterclaim."

Let the public be advised that the premise of the declaration authored by Chief Sam C. Iwuchukwu and Hon Alhaji Obinwa is patently false and therefore their declaration as published on July 16, 2014 is erroneous in its entirety. Chief Sam Iwuchukwu whom I know cannot knowingly and publicly invite the public to violate the United States Trademark laws.

I hereby declare the following to the public knowing fully well that if my declaration is false I am subject to punishment:

1. That I, Dr. Iddi Mgbako, am the incorporator and the Agent of the Peoples Club of Nigeria International (PCNI).
2. That PCNI is registered in the United States with a Federal Identification Number and a bank account in New Jersey.
3. That the US Address of PCNI is 16 Wright St. Edison, New Jersey.
4. That there is no Club Trademark Design registered in New Jersey USA under Chief Fabian Onwuachu.
5. That the name PCNI and its 3 ring design with serial #86116372 is an approved trademark by the United States Government.
6. That any and all infringers of this trademark who are nonmembers of PCNI are hereby made aware of the serious consequences of the violation of the PCNI trademark reserved for use by only legitimate members of PCNI.
7. That the legitimate members of PCNI in the USA are members of one of our 17 branches who are part of the leadership core group (LCG) under the Chairmanship of Hon Bernard Osuagwu who are current with their SSS annual dues payment for the year 2013.
8. That those members who have either been suspended, expelled, or constitutionally rendered inactive due to nonpayment of SSS dues are

unauthorized persons under the Trademark Laws and their gathering under the name and logo of PCNI is unauthorized and a violation of Federal Law.

9. That the public be advised that we have retained Trademark attorneys for enforcement of our trademark. Any individual who has a counterclaim should send the name of their attorney to our PCNI US Address for the purpose of our attorney communicating with their attorney and avoiding unnecessary litigation.
10. That the public be aware that the legitimate leaders of PCNI as elected in December 2013 are Chief Joe Ilonze, President and Hon Smart Ebere, Secretary.

Please direct all inquiries to:

PCNI Trademark Enforcement Group
Peoples Club of Nigeria International
16 Wright St.
Edison, NJ 08820

Phone: 908-757-6456

Fax: 908-757-6476

Patron Dr. Eze Iddi Ambrose Mgbako, MD
Trademark Agent, PCNI
Papal Knight of St. Gregory the Great
July 17, 2014

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Exhibit “O”

ESTTA Tracking number: **ESTTA630117**

Filing date: **09/30/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059944
Party	Defendant Peoples Club of Nigeria International
Correspondence Address	PEOPLES CLUB OF NIGERIA INTERNATIONAL 16 WRIGHT ST EDISON, NJ 08820 UNITED STATES
Submission	Answer
Filer's Name	Matthew H. Swyers
Filer's e-mail	mswyers@thetrademarkcompany.com
Signature	/Matthew H. Swyers/
Date	09/30/2014
Attachments	Answer.pdf(169865 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW the Registrant, Peoples Club of Nigeria International (hereinafter "Registrant"), by and through counsel, The Trademark Company, PLLC, and files their Answer and Grounds of Defense to the Petition to Cancel and in response to Petitioner's allegations states as follows:

ANSWER

Registrant is without knowledge of the allegations set forth in the Introductory Paragraph of the Petitioner's Petition to Cancel and therefore denies the same. In response to the specifically enumerated allegations, the Registrant states as follows:

1. Registrant is without knowledge of the allegations set forth in paragraph 1 of the Petition to Cancel and therefore denies the same.
2. Registrant is without knowledge of the allegations set forth in paragraph 2 of the Petition to Cancel and therefore denies the same.
3. Registrant is without knowledge of the allegations set forth in paragraph 3 of the Petition to Cancel and therefore denies the same.
4. Registrant is without knowledge of the allegations set forth in paragraph 4 of the Petition to Cancel and therefore denies the same.

5. Registrant admits the allegations contained in Paragraph 5 of the Petition to Cancel.
6. Registrant admits the allegations contained in Paragraph 6 of the Petition to Cancel.
7. Registrant admits the allegations contained in Paragraph 7 of the Petition to Cancel.

Registrant cannot verify the authenticity of the attached Exhibit A and therefore denies the same.

8. Registrant is without knowledge of the allegations set forth in paragraph 8 of the Petition to Cancel and therefore denies the same. Registrant cannot verify the authenticity of the attached Exhibit B and therefore denies the same.

9. Registrant admits the allegations contained in Paragraph 9 of the Petition to Cancel.
10. Registrant admits the allegations contained in Paragraph 10 of the Petition to Cancel.
11. Registrant admits the allegations contained in Paragraph 11 of the Petition to Cancel.
12. Registrant admits the allegations contained in Paragraph 12 of the Petition to Cancel.
13. Registrant admits the allegations contained in Paragraph 13 of the Petition to Cancel.
14. Registrant admits the allegations contained in Paragraph 14 of the Petition to Cancel.
15. Registrant admits the allegations contained in Paragraph 15 of the Petition to Cancel.
16. Registrant denies the allegations set forth in Paragraph 16 of the Petition to Cancel as phrased and demands strict proof thereof.

17. Registrant denies the allegations set forth in Paragraph 17 of the Petition to Cancel as phrased and demands strict proof thereof.

18. Registrant is without knowledge of the allegations set forth in Paragraph 18 of the Petition to Cancel and therefore denies the same.

19. Registrant denies the allegations set forth in Paragraph 19 of the Petition to Cancel as phrased and demands strict proof thereof.

20. Registrant cannot verify the authenticity of the attached Exhibit C and therefore denies the same.

21. Registrant admits the allegations contained in Paragraph 21 of the Petition to Cancel.
22. Registrant admits the allegations contained in Paragraph 22 of the Petition to Cancel.

23. There are no allegations to respond to in Paragraph 23 of the Petition to Cancel. As such, Registrant incorporates by reference its responses to the allegations contained in Paragraphs 1-22 as stated hereinabove.

24. Registrant denies the allegations set forth in Paragraph 24 of the Petition to Cancel and demands strict proof thereof.

25. Registrant denies the allegations set forth in Paragraph 25 of the Petition to Cancel and demands strict proof thereof. Registrant cannot verify the authenticity of the attached Exhibit A and therefore denies the same.

26. Registrant denies the allegations set forth in Paragraph 26 of the Petition to Cancel and demands strict proof thereof.

27. Registrant denies the allegations set forth in Paragraph 27 of the Petition to Cancel and demands strict proof thereof.

28. Registrant denies the allegations set forth in Paragraph 28 of the Petition to Cancel and demands strict proof thereof.

WHEREFORE, Registrant prays that the Petition to Cancel be dismissed.

Respectfully submitted this 30th day of September, 2014.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/
Matthew H. Swyers, Esq.
344 Maple Avenue West, Suite 151
Vienna, VA 22180
Tel. (800) 906-8626
Facsimile (270) 477-4574
mswyers@TheTrademarkCompany.com
Counsel for Registrant

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Exhibit “P”

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton- Junction, NJ Branch, Inc.; Peoples Club of Nigeria- International-Miami Branch; and Peoples Club of- Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

INITIAL DISCLOSURES

COMES NOW the Registrant, Peoples Club of Nigeria International (hereinafter "Registrant"), and pursuant to the scheduling order entered in this matter provides the following initial disclosures as required by the applicable rules of the Board.

Disclosures

1. The name(s) and address(es) of each individual likely to have discoverable information along with the subject(s) of that information that may be used to support Registrant's claims:

Dr. Ambrose Mgbako
16 Wright St.
Edison, NJ 08820

* Dr. Ambrose Mgbako retains information concerning all aspects of the instant matter including, but not limited to, Registrant's rights in the mark at issue, dates of use thereof, marketing and other stream of commerce matters, as well as other information pertinent to the instant claims.

2. Copies or descriptions of all documents, electronically stored information, and tangible things that Registrant has in its possession, custody, or control and may use to support its claims or defenses:

Registrant retains business records, trademark applications and registrations and other pertinent documents which it may use to support its claims in the instant matter.

3. For inspection and copying any insurance agreement:

None.

DATED this 7TH day of January, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/
Matthew H. Swyers, Esquire
344 Maple Avenue West, Suite 151
Vienna, VA 22180
Telephone (800) 906-8626 x 100
Facsimile (270) 477-4574
mswyers@TheTrademarkCompany.com
Attorney for Registrant

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

U.S. Registration No. 4,591,874,
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,
Registered on the Official Registry August 26, 2014.

Peoples Club of Nigeria International Princeton-	:	
Junction, NJ Branch, Inc.;	:	
Peoples Club of Nigeria-	:	
International-Miami Branch; and Peoples Club of-	:	
Nigeria International-Chicago Branch,	:	
	:	
Petitioners,	:	Cancellation No. 92059944
	:	
vs.	:	
	:	
Peoples Club of Nigeria International,	:	
	:	
Registrant.	:	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 7th day of January, 2015, to be served, via first class mail, postage prepaid, upon:

CRAIG S HILLARD, ESQ.
STARK & STARK PC
993 LENOX DRIVE, BLDG 2
LAWRENCEVILLE, NJ 08648

/Matthew H. Swyers/
Matthew H. Swyers



**The Trademark
Company**

344 Maple Avenue West, PMB 151
Vienna, VA 22180
Tel. (800) 906-8626
Fax (270) 477-4574
TheTrademarkCompany.com

Matthew H. Swyers, Esq.*
Writer's Direct (800) 906-8626 x100
mswyers@TheTrademarkCompany.com

FRE 408 Applies

March 2, 2015

VIA USPS & ELECTRONIC MAIL

H. Matthew Taylor, Esq.
Stark & Stark P.C.
993 Lenox Drive
Lawrenceville, NJ 08648
mtaylor@stark-stark.com

**RE: Peoples Club of Nigeria International - Princeton Junction v. Peoples Club of Nigeria
International**

Dear Mr. Taylor,

As you know, we represent Peoples Club of Nigeria International in connection with the above-referenced matter. Thank you for your letter dated February 3, 2014 concerning the disclosure of the documents identified in the Registrant's Initial Disclosures. Enclosed please find documents in support thereof.

Thank you for your time and attention to this matter. Should you have any questions regarding this matter, please do not hesitate to contact us.

Yours very truly,

/Matthew H. Swyers/

cc: MTaylor@stark-stark.com;
chilliard@stark-stark.com; and
lrickett@stark-stark.com

*Admitted to practice in Virginia and the District of Columbia. Practice limited to federal trademark and copyright law.

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No.1295

US SERIAL NO. 86116372

BANKERS:

PNC Bank

Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,

P.O. Box 5421

Onitsha, Anambra State,

Tel: 08037080187, 08066728872

E-mail: peopleclubofnigeria@yahoo.com

Website: www.peoplesclubofnigeria.com

Our Ref:

Your Ref:

Date:

NATIONAL/INTERNATIONAL
OFFICERSPresident
Chief Sir J. I. Ilonze1st Vice President
Chief Onyiah O. Okeke2nd Vice President
Chief R. O. C. Ezeigbo3rd Vice President
Chief Sam NwagwuNational Secretary
Chief Smart O. Ebere1st Assistant National Sec.
Chief C. C. Mgbako2nd Assistant National Sec.
Chief Dada NwagwuFinancial Secretary
Chief Patrick OkekeLegal Adviser
Chief F. O. OkekeAssistant Legal Adviser
Chief Okeke AkpanPublicity Secretary
Chief J. O. W. OkekeAssistant Publicity Sec.
Chief Emma OkekeProtocol Officer
Chief Ayan OkekeAssistant Protocol Officer
Chief Dan OkekeWelfare Officer
Chief Law NwagwuAssistant Welfare Officer
Chief Gedy Okeke2nd Assistant Welfare Officer
Chief Ruby Nwagwu3rd Assistant Welfare Officer
Chief Ben NwagwuHouse Master
Chief Martin EzekeAssistant House Master
Chief Ernest O. Ugbo2nd Assistant House Master
Chief Victor Ezeke3rd Assistant House Master
Chief Anura Okeke

July 14 2014

Dr. Ambrose Mgbako MD
Patron – Peoples Club of Nigeria Int'l
New Jersey
USA

TRADEMARK PEOPLES CLUB OF NIGERIA INTERNATIONAL (DESIGN) US SERIAL #86116372

Dr Ambrose Mgbako MD, patron Peoples Club of Nigeria
is the Agent. appointed to monitor the Peoples Club of
Nigeria International trademark in USA and assure that
unauthorized users do not infringe on this trademark.

Dr Mgbako is hereby granted full authority to prosecute
any infringement of this trademark by unauthorized users.

Signed:

[Signature]
Chief Dr Sir J. I. Ilonze
National President

[Signature]
Hon. Smart Ebere
General Secretary

TAUSTEES: HRM Igwe P.O. Ezenwa, Chief J. O. Igwe, Chief E. N. Okeke, Chief I. Ojukwu Ika,
HRM Igwe R.N. Nwankevo, Chief J.C. Okeke, Chief F. N. Okeke
Address all correspondence to the General Secretary
haramserebe@gmail.com (08066728872)

1 OF 1 RECORD(S)

New Jersey Secretary of State

Corporate Filing

Business Information

Filing Number: 0101010702
Name: PEOPLE'S CLUB OF NIGERIA INTERNATIONAL INC.
Name Type: LEGAL
Filing Date: 08/18/2010
Status: ACTIVE
Place Incorporated: NEW JERSEY

Registered Agent

Name: IDDI, AMBROSE MGBAKO
Registered Agent Address: 16 WRIGHT ST
EDISON, NJ 08820-1018

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

Your DPPA Permissible Use is: Litigation
Your GLBA Permissible Use is: Legal Compliance

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PTO Form 1478 (Rev 9/2006)
OMB No. 0651-0009 (Exp 12/31/2014)

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

*NOTE: Data fields with the * are mandatory. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	<u>mark_9767147154-131702076 . logo.jpg</u>
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
APPLICANT INFORMATION	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.
*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
LEGAL ENTITY INFORMATION	
*TYPE	association

Input Field	Entered
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
SPECIMEN DESCRIPTION	letterhead

ADDITIONAL STATEMENTS SECTION

*TRANSLATION
(if applicable)

*TRANSLITERATION
(if applicable)

*CLAIMED PRIOR REGISTRATION
(if applicable)

*CONSENT (NAME/LIKENESS)
(if applicable)

*CONCURRENT USE CLAIM
(if applicable)

DISCLAIMER
No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

ATTORNEY INFORMATION

NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
STREET	344 Maple Ave. West, Suite 151
CITY	Vienna
STATE	Virginia
COUNTRY	United States
ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626

Input Field	Entered
FAX	1-877-351-5480
EMAIL ADDRESS	info@thetrademarkcompany.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
*NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
*STREET	344 Maple Ave. West, Suite 151
*CITY	Vienna
*STATE (Required for U.S. applicants)	Virginia
*COUNTRY	United States
*ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
*EMAIL ADDRESS	info@thetrademarkcompany.com
*AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
FEE INFORMATION	
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
* SIGNATURE	/Matthew H. Swyers/
* SIGNATORY'S NAME	Matthew H. Swyers
* SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

[Back](#)[View/Save Data as PDF](#)

United States of America

United States Patent and Trademark Office

PEOPLES CLUB OF NIGERIA INTERNATIONAL



Reg. No. 4,591,874

Registered Aug. 26, 2014

Int. Cl.: 41

SERVICE MARK

PRINCIPAL REGISTER

PEOPLES CLUB OF NIGERIA INTERNATIONAL (NIGERIA CORPORATION)
16 WRIGHT ST.
EDISON, NJ 08820

FOR: SOCIAL CLUB SERVICES, NAMELY, ARRANGING, ORGANIZING, AND HOSTING
SOCIAL EVENTS, GET-TOGETHERS, AND PARTIES FOR CLUB MEMBERS, IN CLASS 41
(U.S. CLS. 100, 101 AND 107).

FIRST USE 0-0-1994; IN COMMERCE 0-0-1994.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "CLUB OF NIGERIA INTERNATIONAL", APART FROM THE MARK AS SHOWN.

THE COLOR(S) BLACK, BLUE, RED, AND YELLOW IS/ARE CLAIMED AS A FEATURE
OF THE MARK.

THE MARK CONSISTS OF THE BLACK LETTERS "PEOPLES CLUB OF NIGERIA INTERNATIONAL" ABOVE A BLUE CIRCLE BORDERED IN BLACK LINKED TO A RED CIRCLE BORDERED IN BLACK LINKED TO A YELLOW CIRCLE BORDERED IN BLACK.

SER. NO. 86-116,372, FILED 11-12-2013.

MEREDITH MARESCA, EXAMINING ATTORNEY



Nichelle K. Lee

Deputy Director of the United States
Patent and Trademark Office

**REQUIREMENTS TO MAINTAIN YOUR FEDERAL
TRADEMARK REGISTRATION**

**WARNING: YOUR REGISTRATION WILL BE CANCELLED IF YOU DO NOT FILE THE
DOCUMENTS BELOW DURING THE SPECIFIED TIME PERIODS.**

Requirements in the First Ten Years*
What and When to File:

First Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) between the 5th and 6th years after the registration date. See 15 U.S.C. §§1058, 1141k. If the declaration is accepted, the registration will continue in force for the remainder of the ten-year period, calculated from the registration date, unless cancelled by an order of the Commissioner for Trademarks or a federal court.

Second Filing Deadline: You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between the 9th and 10th years after the registration date.*
See 15 U.S.C. §1059.

Requirements in Successive Ten-Year Periods*
What and When to File:

You must file a Declaration of Use (or Excusable Nonuse) and an Application for Renewal between every 9th and 10th-year period, calculated from the registration date.*

Grace Period Filings*

The above documents will be accepted as timely if filed within six months after the deadlines listed above with the payment of an additional fee.

**The United States Patent and Trademark Office (USPTO) will NOT send you any future notice or
reminder of these filing requirements.**

***ATTENTION MADRID PROTOCOL REGISTRANTS:** The holder of an international registration with an extension of protection to the United States under the Madrid Protocol must timely file the Declarations of Use (or Excusable Nonuse) referenced above directly with the USPTO. The time periods for filing are based on the U.S. registration date (not the international registration date). The deadlines and grace periods for the Declarations of Use (or Excusable Nonuse) are identical to those for nationally issued registrations. See 15 U.S.C. §§1058, 1141k. However, owners of international registrations do not file renewal applications at the USPTO. Instead, the holder must file a renewal of the underlying international registration at the International Bureau of the World Intellectual Property Organization, under Article 7 of the Madrid Protocol, before the expiration of each ten-year term of protection, calculated from the date of the international registration. See 15 U.S.C. §1141j. For more information and renewal forms for the international registration, see <http://www.wipo.int/madrid/en/>.

NOTE: Fees and requirements for maintaining registrations are subject to change. Please check the USPTO website for further information. With the exception of renewal applications for registered extensions of protection, you can file the registration maintenance documents referenced above online at <http://www.uspto.gov>.

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Exhibit “Q”

REQUEST NO. 2: Please identify all persons that provided assistance or information in answering these Interrogatories and specify the Interrogatories on which they provided assistance or information.

ANSWER: Ambrose Mgbako, MD with assistance of undersigned counsel.

REQUEST NO. 3: Please attach any and all documents referenced in your answers to Interrogatories.

ANSWER: All responsive documents referenced in Registrant's Responses to Petitioner's Interrogatories have been provided by Registrant in Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 4: Identify all persons you believe have personal knowledge of any facts relevant to this case. Briefly describe and summarize those facts for each person.

ANSWER: The individuals listed below are officers of the Peoples Club of Nigeria International and are familiar with the Club's structure, operations, the dissolution of Petitioner's branches, and other issues related to the use and registration of Registrant's Mark.

- Chief Sir Joseph Ilonze
People's Club of Nigeria's National President
- Hon Dr. Onyekachi Okoro
People's Club of Nigeria's Vice President
- Hon. Smart Ebere
People's Club of Nigeria's General Secretary
- His Royal Majesty Dr. Igwe Arinze
People's Club of Nigeria's Patron
- Innocent Aluka
People's Club of Nigeria's Hon. Patron Professor
- Hon. Professor Emma Opara

People's Club of Nigeria's Assistant National Publicity Officer

- Hon. Attorney Bernard Nwaiwu Esq
People's Club of Nigeria's Chairman
People's Club of Nigeria's Past-Chairman, Leadership Core Group
- Hon. Bernard Osuagwu
People's Club of Nigeria's Chairman Boston Branch
People's Club of Nigeria's Current Chairman, Leadership Core Group
- Attorney Okey Akpom
People's Club of Nigeria's National Deputy Legal Officer

REQUEST NO. 5: Set forth completely and in detail the factual basis for your claim that you are not responsible to the parties serving these Interrogatories as claimed in your Answer to the Petition to Cancel filed in this matter. Attach any and all relevant documents.

ANSWER: Registrant objects on the ground the Request is vague and ambiguous with respect to the term "responsible". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 6: Set forth completely and in detail the factual basis for your claims that you have the exclusive ability to register a service mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

ANSWER: Registrant objects on the basis that this interrogatory asks for a legal opinion. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 7: Have you obtained any statements relating to this action from any party (or the agent, servant or employee of any party)?

ANSWER: Registrant objects on the ground the Request is vague and ambiguous with respect to the term “statements”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

If affirmative, separately, for each such statement, state the name and address of the person who gave the statement and the date upon which the statement was obtained; if oral, the name and address of the person who obtained the statement, and if recorded, the nature and present location of the recording.

ANSWER: Registrant objects on the ground the Request is vague and ambiguous with respect to the term “statements”. Subject to the foregoing objections, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

REQUEST NO. 8: Have any admissions or statements in the nature of an admission been made by any party to this action (or by the agent, servant or employee of any party)?

ANSWER: Registrant objects on the ground the Request is vague and ambiguous with respect to the terms “statements in the nature of admissions”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

If so, separately, for each such admission or statement, state the identity of each person who made each such admission or statement; the identity of each person to whom each such admission or statement was made; the date, time, and place when and where each such admission or statement was made; and the precise words used by the person making each such admission or statement.

ANSWER: Registrant objects on the ground the Request is vague and ambiguous with respect to the terms “statements in the nature of admissions”. Subject to the foregoing objection, see Registrant’s Responses to Petitioner’s Requests for Production of Documents.

REQUEST NO. 9: Set forth, in detail, each and every lawsuit of any kind, including any actions before the Trademark Trial and Appeal Board, that Registrant has been involved with as a party within the last ten years.

ANSWER: Registrant objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 10: Set forth, in detail, any and all instances in which you have requested Petitioners or any third party to discontinue the use of any portion of the registered mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

ANSWER: Registrant objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 11: Identify all communications, of any nature, you have had with any individual, agent or officer of a Petitioner organization regarding the allegations made in the Petition to Cancel. If such communication was verbal, identify the parties to the communication and describe, in detail, the substance of the communication. If such communication was in writing, attach copies hereto.

ANSWER: Registrant objects to the instant interrogatory request to the extent that it seeks information protected from disclosure by any privilege or immunity including, without limitation, the attorney-client privilege. Registrant further objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objections, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 12: Identify all communications, of any nature, you have had with a non-party regarding the allegations made in the Petition to Cancel. If such communication was verbal, identify the

parties to the communication and describe, in detail, the substance of the communication. If such communication was in writing, attach copies hereto.

ANSWER: Registrant objects to the instant interrogatory request to the extent that it seeks information protected from disclosure by any privilege or immunity including, without limitation, the attorney-client privilege. Registrant further objects to this request on the ground that the information is not relevant to this action and is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST NO. 13: Set forth, in detail, any and all facts that support the statements made in your trademark application that "no other person, firm, corporation, or association has the right to use the mark in commerce."

ANSWER: Registrant objects on the basis that this interrogatory asks for a legal opinion. Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 14: Set forth, in detail, your complete understanding of the general corporate structure of People's Club of Nigeria International within the United States and abroad.

ANSWER: People's Club of Nigeria International is a registered Nigerian Corporation with branches in Nigeria, United Kingdom, Canada, and United States of America. Each branch is organized under a Charter granted by People's Club of Nigeria International authorities in Nigeria. Each branch is a subsidiary of People's Club of Nigeria International registered in Nigeria and abides by the Club's Constitution. See also Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 15: Set forth, in detail, the corporate structure of your branch of the People's Club of Nigeria. Please identify individuals by name and title within your organization.

ANSWER: The People's Club of Nigeria in New Jersey is a subsidiary of People's Club of Nigeria International. See also Registrant's Responses to Petitioner's Requests for Production of Documents

REQUEST NO. 16: Set forth, in detail, all facts that support your contention that you are a Nigerian corporation.

ANSWER: See Registrant's Responses to Interrogatory Requests 14 and 15 hereinabove. See also Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 17: Set forth, in detail, all efforts that you took to protect your asserted interest in the mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black, *prior to* the time you filed for registration with the USPTO and registration issued.

ANSWER: Registrant objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

REQUEST NO. 18: Set forth, in detail, all efforts that you took to protect your asserted interest in the mark that consists of the words "People's Club of Nigeria International" with three rings linked together in a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black, *after* you filed for registration with the USPTO and registration issued.

ANSWER: Registrant objects to the Instant Interrogatory on the grounds that it is overly broad and burdensome given the inclusion of the term "All". Subject to the foregoing objection, see Registrant's Responses to Petitioner's Requests for Production of Documents.

DATED this 10th day of March, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esquire

344 Maple Avenue West, Suite 151

Vienna, VA 22180

Telephone (800) 906-8626 x 100

Facsimile (270) 477-4574

msvyers@TheTrademarkCompany.com

Attorney for Registrant

U.S. Registration No. 4,591,874,
For the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL,
Registered on the Official Registry August 26, 2014.

Registrant.

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Cancellation No. 92059944

I HEREBY CERTIFY that I caused a copy of the foregoing this 10th day of March, 2015 to be served, via first class mail, postage prepaid, upon:

/Matthew H. Swyers/
Matthew H. Swyers

AMBROSE MGBAKO

COUNTY OF Middlesex

STATE OF NEW JERSEY

BEFORE ME, the undersigned authority, this 9 day of March 2015, personally appeared Mr. Ambrose Mgbako, who after being first duly sworn, states that he is the person who assisted and provided the answers to Petitioner's First Set of Interrogatories to Registrant and that the answers provided therein are true and correct, and who is personally known to me or who has produced NEW JERSEY Driver License as identification and who did take an oath.

Ambrose Mgbako
Ambrose Mgbako

March 9 2015

Date

ZULEIKA Z HARRIS
Notary Public
State of New Jersey
My Commission Expires June 2018
I.D.# 2215069

Notary Public: Zuleika Z. Harris (signature)

Notary Public: Zuleika Z. Harris (Typed/Printed name of Notary Public)

Commission No. 2215069

My Commission Expires: June 26, 2018

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

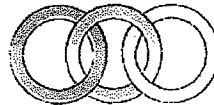
CAC/IT/No.1295

US SERIAL NO. 86116372

BANKERS:

PNC Bank

Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,

P.O. Box 5421

Onitsha, Anambra State,

Tel: 08037080187, 08066728872

E-mail: peopleclubofnigeria@yahoo.com

Website: www.peoplesclubofnigeria.com

Our Ref: _____ Your Ref: _____ Date: _____

NATIONAL INTERNATIONAL
OFFICERS

President

Chief Sir J. I. Ilonze

1st Vice President

Chief Onyekachi O. Okoro

2nd Vice President

Chief R. O. C. Ekechukwu

3rd Vice President

Chief Sam Nwagwu

National Secretary

Chief Smart O. Ebere

1st Assistant National Sec.

Chief C. C. Mgbekwu

2nd Assistant National Sec.

Chief Dora Anyanwu

Financial Secretary

Chief Paulinus Onyiah

Legal Adviser

Chief F. O. Onyekwue

Assistant Legal Adviser

Chief Okoye Alphon

Publicity Secretary

Chief J. O. W. Onyiah

Assistant Publicity Sec.

Chief Emma Opara

Protocol Office

Chief Alvan Okoye

Assistant Protocol Officer

Chief Don Ikehie

Welfare Officer

Chief Law Major

Assistant Welfare Officer

Chief Goddy Okeke

2nd Assistant Welfare Officer

Chief Robby Nwadi

3rd Assistant Welfare Officer

Chief Bon Nwagwu

House Master

Chief I. U. Ezeke

Assistant House Master

Chief Ernest O. Ugbo

2nd Assistant House Master

Chief Victor Ezeke

3rd Assistant House Master

Chief Anas Okeke

July 14 2014

Dr. Ambrose Mgbako MD
Patron – Peoples Club of Nigeria Int'l
New Jersey
USA

TRADEMARK PEOPLES CLUB OF NIGERIA
INTERNATIONAL (DESIGN)
US SERIAL #86116372

Dr Ambrose Mgbako MD, patron Peoples Club of Nigeria is the Agent appointed to monitor the Peoples Club of Nigeria International trademark in USA and assure that unauthorized users do not infringe on this trademark.

Dr Mgbako is hereby granted full authority to prosecute any infringement of this trademark by unauthorized users.

Signed:

Chief Dr Sir J. I. Ilonze
National President

Hon. Smart Ebere
General Secretary

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odinye, Chief I. Ojukwu Iko,
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu
Address all correspondence to the General Secretary
honsmartebereatgmail.com (08066728872)

000001

consequences.

.....
Chief (Sir) J.I. Ilonze
President P.C.N.I.

.....
Hon. (Elder) Smart O. Ebere
General Secretary P.C.N.I

2 of 2

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,
P.O. Box 5421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872
E-mail: peoplesclubofnigeria@yahoo.com
Website: www.peoplesclubofnigeria.com

Our Ref: Your Ref: Date:

17th January, 2014

NATIONAL INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Orychach O. Odo

2nd Vice President
Chief R. O. C. Ekechukwu

3rd Vice President
Chief Sam Ikwigwa

National Secretary
Elder Smart O. Ebere

1st Assistant National Sec.
Chief C. C. Mgbemena

2nd Assistant National Sec.
Lady Doris Ar, 1999

Financial Secretary
Chief P. O. Orychach

Legal Adviser
Chief F. O. Orychach

Assistant Legal Adviser
Sam Olay Alen

Publicity Secretary
Capt. J. O. W. Orychach

Assistant Publicity Sec.
Prof. Emma Ogora

To: All Members of P.C.N.I
All Branch of P.C.N.I. World
Chicago Branch of P.C.N.I
Miami Branch of P.C.N.I
Princeton Junction Branch of P.C.N.I
San-Antonio Branch of P.C.N.I

Final Dissolution and withdrawal of charter of Chicago, Miami and Princeton Junction Branches of P.C.N.I

Further to the decision of Central Executive Committee (C.E.C.) on 20th July, 2013 at Dallas Forth-Worth and letters of 7th September, 2013; dissolving the executive committee of Chicago, Miami and Princeton Junction branches pending the review of their status and re-constitution of new executives, the Club at its Annual General Meeting (AGM) held at its International Headquarters, Onitsha on 29th December, 2013, unanimously resolved as follows:

(i) To close down Chicago, Miami and Princeton Junction completely and withdraw and or cancel the Club's charter for

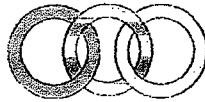
Dissolved

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PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CACIT/No. 1295
Registered in Nigeria.

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.



NOTO: UNITY, LOVE & SERVICE

US Serial No. 86116372
Registered in United States.
NIGERIA/INTERNATIONAL HEADQUARTERS:
Onitsha / Owerri Road,
P.O. Box 6421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872.
E-mail: peoplesclubofnigeria@yahoo.com
Website: www.peoplesclubofnigeria.com

Our Ref:

Your Ref:

Date: 25/10/2014

NATIONAL SECRETARY OFFICERS

President
CHIEF SIR J. I. ILOENZE
1st Vice President
CHIEF OYEKACHI O. OKORO
2nd Vice President
CHIEF R. O. C. EKEODOZIE
3rd Vice President
CHIEF SAM NWIGWE
National Secretary
ELDER SUART O. EBERE
1st Assistant National Sec.
CHIEF C. C. HOJEKHU
2nd Assistant National Sec.
LADY DORIS ANWADOR
Financial Secretary
CHIEF PAULINUS ONYERUFORO
National Treasurer
CHIEF SIR DR. A. E. OKEKE
Legal Adviser
CHIEF F. O. ONYEBUEKE
Assistant Legal Adviser
ANTHONY OFILI EGBUSI (KSM)
2nd Assistant Legal Adviser
BARR. OKAY AKPOUN
Publicity Secretary
CAPT. J. O. W. ONYEMA
Assistant Publicity Sec.
PROF. ELLMA OPARA
Protocol Officer
CHIEF ALVAN OKOYE
Assistant Protocol Officer
HON. BON IBERWE
Welfare Officer
CHIEF GODOY ORAHEDO
Assistant Welfare Officer
LADY RUBY NNADI
2nd Assistant Welfare Officer
IZE BON IKWUAGWU
3rd Assistant Welfare Officer
BRO. GODWIN ADIEME
4th Assistant Welfare
CHIEF S. O. KGBOMAEZE
House Master
CHIEF MARTIN EZEME
Assistant House Master
CHIEF ERNEST O. UGORJI
2nd Assistant House Master
HON. VICTOR IKEZIE
3rd Assistant House Master
HON. ANANE OKEKE

To:

Patron Iddi Mgbako
No. 16 Wright
St Edison
NJ 08820

Sir

INFORMATION ABOUT PEOPLES CLUB OF NIGERIA

Peoples Club of Nigeria International is a social Club registered in Nigeria with branches in Nigeria, Canada, United Kingdom, and United States of America. Each branch is organized under a Charter granted by PCNI authorities in Nigeria. When a charter is withdrawn such a branch ceases to exist regardless of their registration status where they operate. The Club has the right to dissolve offending executives and appoint caretaker committees when appropriate.

The Peoples Club of Nigeria International New Jersey is a subsidiary of Peoples Club of Nigeria International registered in Nigeria. The Peoples Club of Nigeria International New Jersey operates under the constitution of Peoples Club of Nigeria registered in Nigeria. The branches of Peoples Club in the USA report directly to the authorities in Nigeria.

Patron Dr. Ambrose Mgbako is the current appointed agent of PCNI New Jersey and authorized to apply, obtain, monitor and prosecute any violation of Peoples Club of Nigeria International Trademark.

Chief (Dr) Sir J.I. Ilonze
President PCNI

Hon. Elder Smart O. Ebere
National Secretary PCNI

TRUSTEES: HRM Igwe P. C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odiliye, Chief I. Ojukwu Ike,
HRM Igwe R. N. Nwankwo, Chief J. C. Okafor, Chief F. N. Okekearu
Address all correspondence to the General Secretary
honsmartebereatgmail.com (08066728872)

INTERROGATORY NO. 6

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CAC/IT/No.1295

US SERIAL #86116372

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,
P.O. Box 5421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872
E-mail: peoplesclubofnigeria@yahoo.com
Website: www.peoplesclubofnigeria.com

Our Ref: _____ Your Ref: _____ Date: 16th July 2014

NATIONAL INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Onyiah O. Okoro

2nd Vice President
Chief R. O. C. Eke

3rd Vice President
Chief Sam Nwagwu

National Secretary
Elder Smart O. Ebere

1st Assistant National Sec.
Chief C. C. Mgbem

2nd Assistant National Sec.
Lady Dora Anyador

Financial Secretary
Chief Paulinus Oyenuboro

Legal Adviser
Chief F. O. Onyeabueke

Assistant Legal Adviser
Bart Okoye

Publicity Secretary
Capt. J. O. W. Oyeleke

Assistant Publicity Sec.
Prof. Emma Opara

Protocol Officer
Chief Nwan Okoye

Assistant Protocol Officer
Hon. Don Idibia

Welfare Officer
Chief Law Major

Assistant Welfare Officer
Chief Godwin Oranabo

2nd Assistant Welfare Officer
Lady Ruby Nwadi

3rd Assistant Welfare Officer
Nke Bon Ikonu

House Master
Chief Martin Ezekwe

Assistant House Master
Chief Ernest O. Ugoji

2nd Assistant House Master
Hon. Victor Inezie

3rd Assistant House Master
Hon. Ananie Okaka

TO:

- 1) All members of Peoples Club of Nig. Int'l (PCNI)
- 2) The General Public

**REF: UNAUTHORIZED USE OF THE NAME & LOGO OF
PEOPLES CLUB OF NIGERIA INTERNATIONAL (PCNI).**

Further to our earlier warning letter of 14th July 2014, we hereby restate that The Peoples Club of Nigeria International (PCNI), and its three-ring Motto: Unity, Love & Service is a "Trade Mark" entity with a serial #86116372.

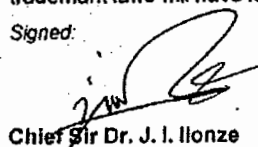
The attention of the Headquarters of Peoples Club of Nigeria International has been drawn to a proposed illegal assembly or gathering of certain expelled members and non-members of the Club in New York, San Francisco, San Antonio and Houston, Texas in the name of Peoples Club of Nigeria International (PCNI).

All legitimate members of the Club and the general public are hereby warned to disregard this group gathering and all their activities, as they are unauthorized, and thus illegal.

For the purpose of this communication, the group in Houston is led by Dr. Alphonsus Okpara, in San Antonio, Texas led by Professor Chuma Achebe, in New York led by Dr. Morris Efobi and in San Francisco led by Dr. Innocent Eke are hereby warned to cease and desist from such illegal and unlawful assembly or gathering in the name of Peoples Club of Nigeria International (PCNI) without express consent and approval from the Headquarters of the Club, duly signed by the President and the General Secretary - Chief Dr. Sir J. I. Ilonze and Hon. Smart Ebere respectively.

You are hereby warned that any or attempted infringement of this trademark laws will have legal consequences. **You are warned!**

Signed:


Chief Sir Dr. J. I. Ilonze
National President


Hon. Smart Ebere
General Secretary

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odiliya, Chief I. Ojukwu Ita,
HRM Igwe R.N. Nwanwo, Chief J.C. Okator, Chief F. N. Okazkuru
Address all correspondence to the General Secretary
honsmartebere@gmail.com (08066728872)

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INTERROGATORY NO 10 -1

July 17, 2014

To: ALL PCNI BRANCHES
ALL MEMBERS OF PCNI
MEMBERS OF GENERAL PUBLIC

Re: Un-authorized use of the name of Peoples Club of Nigeria International posted by Chief Sam C. Iwuchukwu and Hon Alhaji A. N. Obinwa dated 16th July, 2014.

Chief Iwuchukwu and Alhaji Obinwa In a signed statement posted the following on the Internet:

"To be clear, Peoples Club of Nigeria International and Club Trademark Design registered in New Jersey USA under the President Emeritus and Patron Trustee Elect, Chief Fabian Onwuachu regime, belongs to all PCNI members... Thus, any legal action Instituted by any person on the Trademark Design #86116372 shall be met by a counterclaim."

Let the public be advised that the premise of the declaration authored by Chief Sam C. Iwuchukwu and Hon Alhaji Obinwa is patently false and therefore their declaration as published on July 16, 2014 is erroneous in its entirety. Chief Sam Iwuchukwu whom I know cannot knowingly and publicly invite the public to violate the United States Trademark laws.

I hereby declare the following to the public knowing fully well that if my declaration is false I am subject to punishment:

1. That I, Dr. Iddi Mgbako, am the incorporator and the Agent of the Peoples Club of Nigeria International (PCNI).
2. That PCNI is registered in the United States with a Federal Identification Number and a bank account in New Jersey.
3. That the US Address of PCNI is 16 Wright St. Edison, New Jersey.
4. That there is no Club Trademark Design registered in New Jersey USA under Chief Fabian Onwuachu.
5. That the name PCNI and its 3 ring design with serial #86116372 is an approved trademark by the United States Government.
6. That any and all infringers of this trademark who are nonmembers of PCNI are hereby made aware of the serious consequences of the violation of the PCNI trademark reserved for use by only legitimate members of PCNI.
7. That the legitimate members of PCNI in the USA are members of one of our 17 branches who are part of the leadership core group (LCG) under the Chairmanship of Hon Bernard Osuagwu who are current with their SSS annual dues payment for the year 2013.
8. That those members who have either been suspended, expelled, or constitutionally rendered inactive due to nonpayment of SSS dues are

Inter - No 10 - 2

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PUBLIC NOTICE AND WARNING

Violation of Trademark Registration R 4,591,874

October 23, 2014

Our attention has been drawn to a recent internet publication by Dr. Anayo Onwumere dated October 21, 2014 announcing the results of PCNI- Houston branch election recently conducted in Houston, Texas.

The public should take note of the following:

1. There is no election authorized by Peoples Club of Nigeria International in Houston, Texas as reported by Dr. Onwumere.
2. The so called election is a violation of PCNI Trademark Reg. No. 4,591,874 and carries with it severe legal consequences.
3. The legitimate Houston Branch of Peoples Club of Nigeria International operates under the leadership of Chief Obinna Mbachu, Chairman.
4. The election referred to by Dr. Onwumere is organized by former members of the club who have either been suspended or have withdrawn their membership on the club voluntarily as contained in a list of withdrawn members dated 23rd December, 2013 and signed by Chief Sir J.I. Ilonze, President and Hon. Elder Smart O. Ebere, General Secretary. This list can be verified by Chairman Mbachu.
5. Dr. Emmanuel Uzoma Opara is the only authorized National Officer permitted to publish recognized election results of PCNI in United States.
6. Any individual claiming to be a member of the Peoples Club of Nigeria International should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Ebere, General Secretary. Any member who fails to produce such proof is an impostor.
7. Nonmembers who recently filed a petition to cancel the PCNI trademark are hereby warned that such a petition does not allow for continued violation of the trademark reserved for the use of members only.
8. There is only one Peoples Club of Nigeria International and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebere required by the constitution to maintain membership.

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unauthorized persons under the Trademark Laws and their gathering under the name and logo of PCNI is unauthorized and a violation of Federal Law.

9. That the public be advised that we have retained Trademark attorneys for enforcement of our trademark. Any individual who has a counterclaim should send the name of their attorney to our PCNI US Address for the purpose of our attorney communicating with their attorney and avoiding unnecessary litigation.
10. That the public be aware that the legitimate leaders of PCNI as elected in December 2013 are Chief Joe Ilonze, President and Hon Smart Ebere, Secretary.

Please direct all inquiries to:

PCNI Trademark Enforcement Group
Peoples Club of Nigeria International
16 Wright St.
Edison, NJ 08820

Phone: 908-757-6456

Fax: 908-757-6476

Patron Dr. Eze Iddi Ambrose Mgbako, MD
Trademark Agent, PCNI
Papal Knight of St. Gregory the Great
July 17, 2014

Inter 10-10-14

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PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:

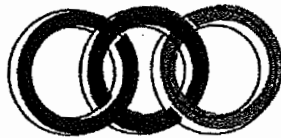
PNC Bank
Zenith Bank of Nigeria Plc.

CAC/TT/NO. 1295

REGISTERED IN NIGERIA

US SERIAL NO. 86116372

REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,

P.O. Box 5421

Onitsha, Anambra State,

Tel: 08037080187, 08066728872

E-mail: peopleclubofnigeria@yahoo.com

Website: www.peoplesclubofnigeria.com

NATIONAL/INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Onyekachi O. Okoro

2nd Vice President
Chief R. O. C. Ekedozie

3rd Vice President
Chief Sam Nwagwu

National Secretary
Elder Smart O. Ebero

1st Assistant National Sec.
Chief C. C. Mojekwu

2nd Assistant National Sec.
Lady Doris Anyador

Financial Secretary
Chief Paulinus Onyenunoro

Legal Adviser
Chief F. O. Onyebueke

Assistant Legal Adviser
Barr. Okay Akpom

Publicity Secretary
Capt. J. O. W. Onyema

Assistant Publicity Sec.
Prof. Emma Opara

Protocol Office
Chief Alvan Okoye

Assistant Protocol Officer
Hon. Don Ibekwe

Welfare Officer
Chief Law Major

Assistant Welfare Officer
Chief Gody Oranabo

1st Assistant Welfare Officer
Lady Rubby Nnadi

2nd Assistant Welfare Officer
Nze Bon Ikwaagwu

House Master
Chief Martin Ezeike

Assistant House Master
Chief Ernest O. Ugorji

1st Assistant House Master
Hon. Victor Ihezue

2nd Assistant House Master
Hon. Anane Okeke

PUBLIC NOTICE AND WARNING Violation of Trademark Registration R 4,591,874

November 5, 2014

Our attention has been drawn to the lawsuit between New York City branch of People's Club of Nigeria International and individuals claiming to be members of our club.

The public should take note of the following:

1. The legitimate New York City Branch of Peoples Club of Nigeria International operates under the leadership of Chief Robert Ochiagha, Chairman.
2. Any individual claiming to be a member of the Peoples Club of Nigeria International should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Smart Ebero, General Secretary. Any member who fails to produce such proof is an impostor.
3. There is only one Peoples Club of Nigeria International and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebero required by the constitution to maintain membership.
4. The Peoples Club of Nigeria International is headquartered in Onitsha, Anambra State, Nigeria under the elected President, Chief Joe Ilonze. Any other individual claiming to be President is an impostor.
5. The public is hereby made aware by this public notice that certain members of Peoples Club of Nigeria International who were suspended or expelled or voluntarily withdrew their membership by not paying their constitutionally mandated annual Social Security Scheme dues continue to parade themselves to the public as members of Peoples Club of Nigeria International. This group of members is imposters.
6. The public is hereby advised to verify the status of individuals claiming membership on Peoples Club of Nigeria International by doing one of the following:
 - a. Contacting Hon Bernard Osuagwu, Chairman Leadership Core Group.
 - b. Hon Chief Dr. Onyekachi Okoro, Vice President, Peoples Club of Nigeria International.
 - c. Professor Emmanuel Uzoma Opara, Assistant National Publicity Secretary.
 - d. Eze Iddi Dr. Ambrose Mgbako, Agent, Peoples Club of Nigeria International and Trademark Enforcement Agent.
7. Legitimate enquiries to access verifying information on individuals or groups claiming membership on Peoples Club of Nigeria International can be directed to fax # 908-757-6476.
8. The Peoples Club of Nigeria International has a current and only registered trademark Registration R 4,591,874 which was published in August 2014 and for use of members only. It covers our name, our 3 ring symbol, and all applicable Internet addresses. All former members are prohibited from using our service marks.
9. The Attorneys acting on behalf of the purported members of Peoples Club of Nigeria International suing Chief Robert Ochiagha are hereby advised to verify the membership status of these individuals claiming to be members of the club. The first charter establishing the New York City branch has been cancelled and new charter issued to Chief Robert Ochiagha who is the current recognized Chairman of Peoples Club of Nigeria International New York City.
10. Any person doing business with nonmembers of Peoples Club of Nigeria who pretend to be members does so at his own risk. The public is hereby duty warned.

Ambrose Mgbako, MD

Trademark Enforcement Agent

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu
Address all correspondence to the General Secretary
honsmartebereat@gmail.com (08066728872)

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PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:

PNC Bank
Zenith Bank of Nigeria Plc.

CAC/IT/NO. 1295
REGISTERED IN NIGERIA

US SERIAL NO. 86116372
REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,
P.O. Box 5421

Onitsha, Anambra State,

Tel: 08037080187, 08066728872

E-mail: peopleclubofnigeria@yahoo.com

Website: www.peoplesclubofnigeria.com

Our Ref: Your Ref: Date:

NATIONAL/INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Onyekachi O. Okoro

2nd Vice President
Chief R. O. C. Ekedozie

3rd Vice President
Chief Sam Nwagwu

National Secretary
Elder Smart O. Ebere

1st Assistant National Sec.
Chief C. C. Mojekwu

2nd Assistant National Sec.
Lady Doris Anyador

Financial Secretary
Chief Paulinus Onyenunoro

Legal Adviser
Chief F. O. Onyebueke

Assistant Legal Adviser
Barr. Okoye Akpom

Publicity Secretary
Capt. J. O. W. Onyema

Assistant Publicity Sec.
Prof. Emma Opara

Protocol Officer
Chief Alvan Okoye

Assistant Protocol Officer
Hon. Don Ibekwe

Welfare Officer
Chief Law Major

Assistant Welfare Officer
Chief Gody Oranabo

2nd Assistant Welfare Officer
Lady Rubby Nnadi

3rd Assistant Welfare Officer
Nze Bon Ikwagwu

House Master
Chief Martin Ezeike

Assistant House Master
Chief Ernest O. Ugoji

2nd Assistant House Master
Hon. Victor Ihezue

3rd Assistant House Master
Hon. Anane Okeke

PUBLIC NOTICE AND WARNING

**Violation of Trademark Registration R 4,591,874 and
Registered Corporate Name # 3616272**

November 24, 2014

**TO: Dr. Chief Innocent Ekeh, Professor Victor Dike, Mr. Bennie Onwuemeka.
Mr. Humphrey Okeke and Ken Chika & ETC**

The attention of the headquarters of people Club of Nigeria International Onitsha, Nigeria and the People Club of Nigeria International San Francisco (PCNI) Branch Inc., has been drawn to a public advert by some expelled former members of the Club informing the public of their purported planned Christmas party on Dec. 6th 2014 at Sacramento CA in the name of people Club of Nigeria International San Francisco branch Inc., Northern Ca.

The public should take note of the following:

The legitimate San Francisco Branch of Peoples Club of Nigeria International operates under the leadership of Chief David Ibeabuchi, Chairman and the Executives of the branch.

1. Any individual claiming to be a member of the Peoples Club of Nigeria International San Francisco Branch should be able to produce a current proof of the payment of Social Security Scheme signed by Hon Smart Ebere, General Secretary. Any member who fails to produce such proof is an impostor.
2. There is only one Peoples Club of Nigeria International San Francisco Branch and no recognized divisions allowed by the Constitution of Peoples Club of Nigeria. The public can verify the status of their clients who claim membership on Peoples Club by contacting the Assistant National Publicity Officer, Dr. Emmanuel Uzoma Opara and the proof of payment of Social Security Scheme dues from Hon Smart Ebere required by the constitution to maintain membership.
3. The Peoples Club of Nigeria International is headquartered in Onitsha, Anambra State, Nigeria under the elected President, Chief Joe Ilonze.

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odiliye, Chief I. Ojukwu Ike,
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekearu
Address all correspondence to the General Secretary
honsmardebereal@gmail.com (08066728872)

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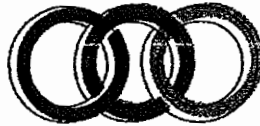
PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:

PNC Bank
Zenith Bank of Nigeria Plc.

CAC/IT/NO. 1295
REGISTERED IN NIGERIA

US SERIAL NO. 86116372
REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,
P.O. Box 5421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872
E-mail: peopleclubofnigeria@yahoo.com
Website: www.peoplesclubofnigeria.com

Our Ref: _____ Your Ref: _____ Date: _____

NATIONAL/INTERNATIONAL OFFICERS

President
Chief Sir J. I. Bonza

1st Vice President
Chief Onyekachi O. Okoro

2nd Vice President
Chief R. O. C. Ekedozie

3rd Vice President
Chief Sam Nwagwu

National Secretary
Elder Smart O. Ebera

1st Assistant National Sec.
Chief C. C. Mojekwu

2nd Assistant National Sec.
Lady Doris Anyador

Financial Secretary
Chief Paulinus Onyenunoro

Legal Adviser
Chief F. O. Onyebueke

Assistant Legal Adviser
Barr. Okoye Akpom

Publicity Secretary
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Prof. Emma Opara

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Hon. Don Ibekwe

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Chief Law Major

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2nd Assistant Welfare Officer
Lady Ruby Nnadi

3rd Assistant Welfare Officer
Nze Bon Ikhuagwu

House Master
Chief Martin Ezeke

Assistant House Master
Chief Ernest O. Ugorji

2nd Assistant House Master
Hon. Victor Ihezie

3rd Assistant House Master
Hon. Anane Okeke

5. The public is hereby made aware by this public notice that certain former members of Peoples Club of Nigeria International San Francisco who were suspended or expelled or voluntarily withdrew their membership by not paying their constitutionally mandated annual Social Security Scheme dues continue to parade themselves to the public as members of Peoples Club of Nigeria International San Francisco branch. This group of former members or (individuals) is imposters.
6. The public is hereby advised to verify the status of individuals claiming membership on Peoples Club of Nigeria International San Francisco branch by doing one of the following:
 - a. Contacting Hon David Ibeabuchi, Chairman Peoples Club of Nigeria International San Francisco branch Inc., Northern California.
 - b. Contacting Hon Bernard Osuagwu, Chairman Leadership Core Group.
 - c. Hon Chief Dr. Onyekachi Okoro, 1ST National Vice President, Peoples Club of Nigeria International.
 - d. Professor Emmanuel Uzoma Opara, Assistant National Publicity Secretary.
 - e. Eze Iddi Dr. Ambrose Mgbako, Agent, Peoples Club of Nigeria International and Trademark Enforcement Agent.
7. Legitimate inquiries to access verifying information on individuals or groups claiming membership of Peoples Club of Nigeria International can be directed to fax # 908-757-6476.
8. The Peoples Club of Nigeria International has a current and only registered trademark Registration R 4,591,874 which was published in August 2014 and for use of members only. It covers our name, our 3 ring symbol, and all applicable internet addresses. All expelled former members are prohibited from using our service marks. They are prohibited from using our people's club of Nigeria San Francisco (PCNI) Corporate name registered with Secretary of State, State of

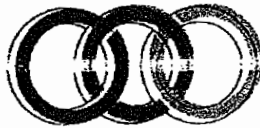
TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odiliya, Chief I. Ojukwu Ike,
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu
Address all correspondence to the General Secretary
honsmartebere@gmail.com (08066728872)

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PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.
CAC/IT/NO. 1295
REGISTERED IN NIGERIA
US SERIAL NO. 86116372
REGISTERED IN UNITED



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:
Onitsha/Owerri Road,
P.O. Box 5421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872
E-mail: peopleclubofnigeria@yahoo.com
Website: www.peoplesclubofnigeria.com

Our Ref: **Your Ref:** **Date:**

NATIONAL/INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Onyekachi O. Okoro

2nd Vice President
Chief R. O. C. Ekeozie

3rd Vice President
Chief Sam Nwagwe

National Secretary
Elder Smart O. Ebere

1st Assistant National Sec
Chief C. C. Mojekwu

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Welfare Officer
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Chief Goddy Orianebo

2nd Assistant Welfare Officer
Lady Ruby Nnadi

3rd Assistant Welfare Officer
Nze Bon Iwuagwu

House Master
Chief Martin Ezeike

Assistant House Master
Chief Ernest O. Ugwuji

2nd Assistant House Master
Hon. Victor Ihezie

3rd Assistant House Master
Hon. Anane Okeke

9. Any Company or individuals acting on behalf or doing business with the purported former members of Peoples Club of Nigeria International San Francisco Branch, (Namely Dr. Chief Innocent Eke, Professor Victor Dike, Mr. Bennie Onwuemeka, Mr. Humphrey Okeke and Ken Chika & ETC) are hereby advised to verify the membership status of these individuals claiming to be members of the club.
10. Dr. Innocent Eke and his group have refused to surrender the first charter establishing the San Francisco branch. Possession of the charter does not constitute membership in the Club.
11. These Corporate name and Trademark law breakers are hereby warned to cease and desist from further violation of US Trademark laws by unlawfully using club's trademark name, Logo and Corporate name to deceive and defraud the general public, without express authority from the People Club Of Nigeria International (PCNI) Trademark Agent in USA, Dr. Ambrose Mgbako and Corporate Name David Ibeabuchi, Chairman San Francisco Branch.
12. Any person doing business with nonmembers of Peoples Club of Nigeria who pretend to be members does so at his own risk. The public is hereby warned.

Ambrose Mgbako, MD

Ambrose Mgbako, MD
Trademark Enforcement Agent

Nov. 24, 2014
Date

Cc: Mr. Ibrahim Measher (General Manager)
Double Tree by Hilton Hotel
Sacramento California
2001 Point W Way
Sacramento, CA 95815, US.

Phone: 916-929-8853 Fax: 916-614-3818

Email: risa_ds@hilton.com Director of Sales & Marketing: Nancy Vasquez

TRUSTEES: HRM Igwe P.C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odiliya, Chief I. Ojukwu Ike,
HRM Igwe R.N. Nwankwo, Chief J.C. Okafor, Chief F. N. Okekeanu
Address all correspondence to the General Secretary
honsmartebere@gmail.com (08066728872)

10.8
After Nov 8

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We ask our many members to be patient and understanding. The continued violation of our trademark will soon be gone.

Eze Iddi Ambrose Mgbako, MD
Trademark Enforcement Agent
Peoples Club of Nigeria International

Inter 10-9

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February 18, 2015

Public Notice and Warning regarding the violation of the trademark of People's Club of Nigeria
International by the dissolved Chicago Branch.

The attention of the public has been drawn to the internet publication published February 16, 2015 of
an election of officers of the Executive and Branch Board of Directors of Chicago Branch, Peoples Club of
Nigeria International (PCNI).

The People's Club of Nigeria International dissociates itself from this publication for the
following reasons:

1. The Chicago Branch of People's Club of Nigeria International was chartered by the
Headquarters of PCNI in Onitsha on July 28, 2007 at the Comfort Suites O'Hare, 4200 North
River Road, Schillei Park, Illinois and operated legitimately until the Chicago Branch was
dissolved at the Annual General Meeting in Onitsha, Anambra State Nigeria In December
2013. "He who has the right to hire retains the right to fire."
2. As of December 2013, the Chicago Branch of PCNI ceased to exist. Those who claim to
operate the so-called Progressive PCNI should know or should have known that there are no
parallel groups of People's Club of Nigeria International recognized under the Nigeria
Certificate of Incorporation of People's Club of Nigeria or the constitution of PCNI. It is
fraudulent to project this alleged division of PCNI to the public.
3. The dissolved Chicago Branch is currently at the United States Trademark Board appealing
their exclusion from the mark of People's Club of Nigeria International. This serious violation
of our mark shall be brought to the attention of the Trademark Branch through our
attorneys.
4. The Chicago Press Release of February 16, 2015 is a clear evidence that these former
members are running a completely different organization with their branch Board of
Directors which does not exist under the Constitution of PCNI.
5. The public are hereby warned that any individual or group dealing with the so-called
Chicago Branch of PCNI does so at its own risk.

The nonmembers continuing to operate a nonexistent Chicago Branch of PCNI are hereby
warned to cease and desist from continuing to do so. Violation of our trademark has its
consequences under the law.

Ambrose Mgbako, MD
Trademark Agent
Trademark Enforcement Group
People's Club of Nigeria International

Inter 10-10

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NO. 1292



CAC/61541

CORPORATE AFFAIRS COMMISSION
FEDERAL REPUBLIC OF NIGERIA

COMPANIES AND ALLIED MATTERS DECREE No.1, 1990
(PART C—INCORPORATED TRUSTEES)

CERTIFICATE OF REGISTRATION

Of the Incorporated Trustees of..... PEOPLES CLUB OF NIGERIA

IT IS HEREBY CERTIFIED THAT:
(SEE PAGE FOUR)

the duly appointed Trustees of..... PEOPLES CLUB OF NIGERIA
have this day been registered as a corporate body, subject to the below
mentioned conditions and directions.

Given under the affixed common seal of the Corporate Affairs
Commission at Abuja this day of 10th January, 1992

I. A. TUL
REGISTRAR GENERAL

CONDITIONS AND DIRECTIONS

"This Certificate is liable to cancellation should the objects or the
rules of the body as set out in the Annexures hereto be changed without
the previous consent in writing of the CAC or should the body at any
time permit or condone any divergence from or breach of such objects
and rules, or the body is dissolved under Section 691 of the Companies
and Allied Matters Decree No.1, 1990."

Answer, NO 16

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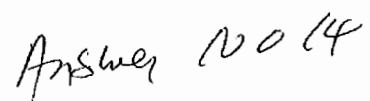
THE PROPOSED TRUSTEES

1. JAMES G. BROWN
2. JAMES G. BROWN
3. JAMES G. BROWN
4. JAMES G. BROWN
5. JAMES G. BROWN
6. JAMES G. BROWN
7. JAMES G. BROWN
8. JAMES G. BROWN
9. JAMES G. BROWN
10. JAMES G. BROWN

List of Incorporating Trustees.



Answer, no 14





Answer no 1p



PEOPLES CLUB OF NIGERIA INTERNATIONAL

the sponsoring branch, PCNI Boston as required. On January 26, 2006, the club was incorporated in the State of Illinois and on October 31, 2006 the propose branch received a formal approval from PCNI HQ in Nigeria. The branch is inaugurated and chartered today July 28 2007 in Chicago, Illinois. ✓

Needless to say that today could not have been a reality, but for the unwavering support and love of Boston Branch Chairman, Chief/Sir Victor Udoji (K of C) (Akaekpchioma I of Adazi-Anni). Your deliberate efforts and constant communications with PCNI HQ have yielded the targeted results and today we are witnessing before our eyes the transmutation of the "Proposed. People's Club of Nigeria International (PCNI) Chicago Branch into the People's Club of Nigeria International (PCNI) Chicago with a conspicuous loss of the word Proposed". Chief / Sir Udoji, accept my sincere thanks.

I am not oblivious of the challenges ahead of us at this nascent stage, but with the help of crème of the society who are the founding and new members of this esteemed club, we will overcome these challenges and achieve the primary objectives of the PCNI. I say this with confidence because PCNI Chicago members encapsulate a personification of the PCNI Motto: "Love, Unity and Service". With the type of social cohesion, friendship, love and unity prevailing amongst the existing members in Chicago and proposed branch members, the sky is truly our limit. Our pledge is not only to be agents of growth and development of this club in Chicago, but also to the entire Mid West.

To CEC delegates, I bid you to please keep the light burning. We love and admire your life of sacrifice, love and abiding faith in the capacity of the club to change our world for the better. To our sponsoring branch, Boston, I say to you, do not worry we are now joined by an ethereal cord that cannot be easily severed. To our honorable founding new members, this is your day enjoy, savor and milk it and after today, go back to work because there is work to do. To our brothers and sisters who are part of this epoch-making event, join us; it will be the best thing to ever happen to your life.

I cannot conclude these remarks without acknowledging the tireless efforts of the organizing Org. Secretary PCNI Chicago, Mr. lyke Eziefuta. Your sleepless nights have ensured that there is today. Also permit me to extend my appreciation to the all organizing officers especially in publicity department, the best man in the world, Mr. Best Anaele; you are truly a human machine, chairman of the inauguration committee (Hon. Dr. Paul Ujor), and sub-committee chairmen. It is no gain saying that without the hard work of these officers and committees today will not be a reality. My prayer is for the prevailing unity in the club to remain a permanent future that will be germane for building this club into a stallion amidst PCNI branches world wide

To all our guests, this is a day you will not forget in a hurry, so relax and savor this time with us; we are all in this together.

Thank you, all for honoring our invitation, may Almighty God keep and guide you safely back to your various destinations.

"Welcome"

Long Live PCNI World Wide
Long Live PCNI Chicago ✓

Hon. Dr. Anayo Ukeje (Agunwa).

Answer no 14

PEOPLES CLUB OF NIGERIA INTERNATIONAL

Program of Event

1. Introduction of Hon. MC Sir Engr. Iyke Okoro Sr. (The Peoples Social Thermostat)
2. Procession and Seating of Delegates
3. Opening Prayer
4. Announcment of silence for our Founder, Chief T. I. Umuezoke, Parents of the PCNI Chicago Chairman Nze E. J. Ukeje (Ejide Dike Naka) and Ezinne Ogunwo Mary Ann Ukeje
5. The national Anthems (USA, Nigeria & Peoples Club)
6. Introduction of CEC Delegates, Executives of Other Branches and Distinguished Guests
7. Libation and Breaking of Kola nuts
8. Dinner Dinner Dinner
9. Welcome Address by the sponsoring Chairman (Chief / Sir Victor Udoji [K of C] Hon. Chairman PCNI Boston
10. Key note Address by the National and International Chairman, Management Committee PCNI, Chief Fabian Dawuachu (Acharango, Osuofit Akokwili)
11. Inauguration & Chartering of Chicago-PCNI Branch
12. Introduction of the Chicago Chairman & His Executives by Chief / Sir Victor Udoji [K of C] Hon. Chairman PCNI, Boston Branch and swearing in of the officers
13. Opening of the floor -----Leader of the CEC delegates
14. Address by Chicago Branch Chairman, Hon. Dr. Anayo Ukeje M. Ukeje (Agunwa)
15. Induction of New Members
16. Toasting the New Branch & the New Members
17. Celebration Dancing by the Chairman & his wife to be joined by his Executives & the newly inducted members
18. Presentation of new members & member Appreciations
19. Dance! Dance! Dance
20. Closing Remarks by the Vice Chairman, Chief Jeff Uju
21. Dance! Dance! Dance

18

Reply

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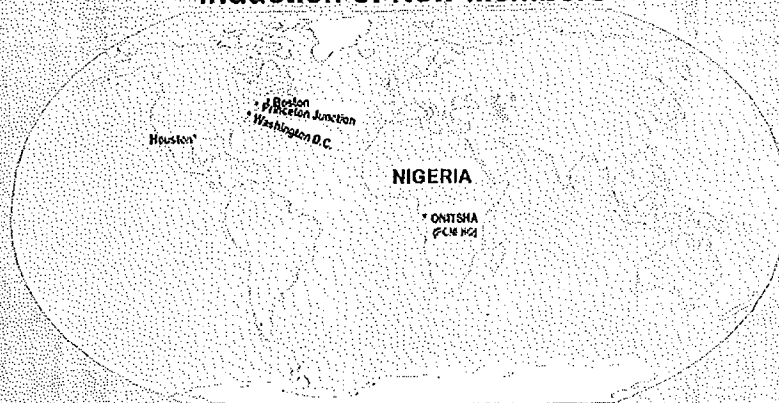
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Answer 20/14

**People's Club of Nigeria
International
PRINCETON JUNCTION
NEW JERSEY USA BRANCH**

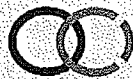


**Inauguration, Chartering &
Induction of New Members**



**SATURDAY, JULY 21, 2007
7:00 PM to 2:00 AM**

**PREMIERE HOTEL, PRINCETON, NEW JERSEY
4355 ROUTE 1 PRINCETON, NEW JERSEY
609-452-2400**



Motto: Unity, Love, & Service



Answer no 14

000022

2/18/15 3:13 PM

000022



Motto: *Unity, Love, & Service*



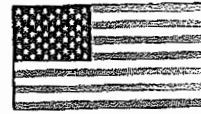
PROGRAM OF EVENT

- ♦ INTRODUCTION OF MC ... By Chief Charles Ogunni, Secretary-General, PCNI-Boston Branch
 - ♦ PROCESSION-SEATING OF DISTINGUISHED GUESTS
 - ♦ OPENING PRAYER BY REV. DR. AMADI
 - ♦ SINGING OF THE ANTHEMS
 - UNITED STATES
 - NIGERIA
 - PEOPLE'S CLUB
 - ♦ INTRODUCTION OF DELEGATES FROM NIGERIA ... By Chief Charles Ogunni, Secretary-General, PCNI-Boston Branch
 - ♦ TRADITIONAL PRESENTATION & BREAKING OF KOLA NUTS
 - ♦ INTRODUCTION OF THE FOUNDING MEMBERS OF PCNI-PRINCETON JUNCTION BRANCH By Chief Engr. Paul Fzeoka, Secretary-General of Branch
 - ♦ DINNER DINNER DINNER
 - ♦ KEY NOTE ADDRESS BY THE LEADER OF DELEGATES FROM NIGERIA ... Chief Fabian Ogunwachu, Chairman of Management Committee, PCNI.
 - ♦ INAUGURATION & CHARTERING OF PCNI-PRINCETON JUNCTION BRANCH
 - ♦ INDUCTION OF NEW CANDIDATES FOR MEMBERSHIP By John Udo, Esq., Legal Advisor, PCNI-Boston Branch.
 - ♦ TOASTING OF THE NEW BRANCH AND THE NEW INDUCTEES ... By Chief, Sir Victor I. Udeji, Chairman of the Sponsoring Branch - PCNI-Boston Branch
 - ♦ DANCE DANCE DANCE
 - ♦ FOUNDING CHAIRMAN'S SPEECH (Chief, Sir, Dr. Charles C. Anokute, Ezewuhie)
 - ♦ DANCE DANCE DANCE
 - ♦ CLOSING REMARKS ... By Chief, Prof. Dr. Gordon A. Ndubizu, Chairman Emeritus, PCNI-Princeton Branch & Chair, Board of Trustees, PCNI-Princeton Junction Branch.
- THANKS FOR YOUR COMPANY AND HAVE A SAFE JOURNEY BACK HOME!!!

Answer to
14



Motto: Unity, Love, & Service



CHAIRMAN'S ADDRESS.

HONOURABLE MEMBERS OF THE NIGERIA PEOPLES CLUB INTERNATIONAL,
DELEGATES FROM NIGERIA, LADIES AND GENTLEMEN,

IT IS WITH HUMILITY MINGLED WITH JOY THAT I WELCOME YOU TO OUR
INAUGURATION AND INDUCTION CEREMONIES TONIGHT.

HUMILITY IN THAT WORDS ARE INNADEQUATE FOR ME TO EXPRESS THE HASSLE WE
WENT THROUGH TO BE HERE TONIGHT. IN FACT I HAD TO TAKE AN IMPROMPTU
EYE TO SAN FRANCISCO TO FOISTALL THE EVIL MACHINATIONS OF OUR
DETRACTORS WHO WENT AS FAR AS TRYING TO PREVENT THE NIGERIAN
DELEGATES FROM COMING HERE FOR THIS EVENT TONIGHT, AND JOY IN THAT THIS
IS A DREAM COME THROUGH, DESPITE ALL ODDS.

IT WAS 10 YEARS AGO THAT WE GATHERED IN A PLACE LIKE THIS TO START A
CLUB CALLED PEOPLE'S CLUB OF NIGERIA, PRINCETON BRANCH. THIS CLUB GREW
IN LEAPS AND BOUNDS IN A VERY SHORT TIME AND WAS DOING VERY WELL TILL
2004 WHEN IT WAS HIJACKED TO NEWARK BY ONE OF THE WRONG PEOPLE WE
RECRUITED BY MISTAKE, AND EVEN ELECTED AN OFFICER IN AN ATTEMPT TO TAME
THE SHREW, IN AN ELECTION CONDUCTED BY DELEGATES FROM ONITSHA.

SINCE ONCE BITTEN TWICE SHY, WE HAVE TAKEN OUR TIME THIS SECOND TIME
AROUND TO RECRUIT A SELECT GROUP OF PERSONS WHOSE INDUCTION WE ARE
HERE TO WITNESS TONIGHT.

WE HAVE DONE OUR HOMEWORK VERY WELL THIS SECOND TIME AROUND AND MY
THANKS TO THE SAME PEOPLE WHO FOUNDED THE DEFUNCT PRINCETON BRANCH
TEN YEARS AGO, IN THE PERSONS OF:

MY HUMBLE SELF, CHIEF, DR. C.C. ANOKUTE, THE FOUNDING CHAIRMAN,
PROFESSOR GORDIAN NDURUMU, THE CURRENT CHAIRMAN OF THE BOARD OF
TRUSTEES,
CHIEF ENG. PAUL EZEUKA, FOUNDING EXECUTIVE SECRETARY,
CHIEF ALLWELL EZEALAJI, FOUNDING TREASURER,
DR. PAUL OGBONNA, FOUNDING FINANCIAL SECRETARY,
CHIEF, DR. CHIKK OBIANWU, TRUSTEE,
DR. JUSTIN EGEJURU, TRUSTEE AND
MAZORINTA ORI, TRUSTEE.

A SPECIAL THANKS TO CHIEF, ENGINEER PAUL EZEUKA, OUR ABLE SECRETARY
WHO WORKED VERY HARD TO MAKE THIS EVENT THE BIG SUCCESS THAT IT IS
TONIGHT.

WITH THE CALIBRE OF PEOPLE LIKE THESE, ONE CANNOT GO WRONG IN TRYING TO
RUN A FORTHABLE SOCIAL CLUB AND I HOPE TO INVITE YOU AGAIN TO
CELEBRATE OUR ANNIVERSARY ONE YEAR FROM TODAY.

THANKS VERY MUCH INDEED FOR YOUR PATRONAGE AND GOD BLESS YOU,
CHIEF, DR. SIR CHARLES C. ANOKUTE, FILD, U.S.A., FELLOW OF THE ROYAL SOCIETY
OF HEALTH, LONDON, DIPLOMATE IN INTERNATIONAL DIPLOMACY, U.S.A.

Answer No
14

PEOPLES CLUB OF NIGERIA INTERNATIONAL

**Welcome Remark by Dr. Anayo Michael Ukeje (Agunwa),
Founding Chairman People's Club of Nigeria International (PCNI)
Chicago Branch, Illinois, USA.**

His Royal Highness/Majesty, Igwes, Ndi Eze, Nze na Ozo, the Chiefs, the Central Executive Committee (CEC) of People's Club of Nigeria International, the Honorable Chairman of our esteemed Club from Boston and the sponsoring Chairman PCNI Chicago Branch Chief, Sir Victor Udoji (K of C) (Nwamurugbaegbe, Urualla), PCNIUSA Chairmen and Secretaries, delegates from all PCNI Branches, my rocks-the honorable and new members of People's Club of Nigeria International (PCNI) Chicago Branch Illinois, USA, Ladies and gentleman, all protocols observed.

I wish to start by extending my warmest "welcome" to CEC delegates who traveled thousands of miles to be here today. I equally want to "welcome" all the PCNI-USA delegates, guests, friends and well-wishers from all over United States of America who have gathered here tonight to witness an epoch event of "Inauguration, Chartering and Induction of new members of People's Club of Nigeria International (PCNI) Chicago Branch, Illinois, USA.

Today, July 28, 2007, is indeed a memorable day that will leave an indelible mark in the sand of time not only for the Nigerian community in Chicago, Illinois but the entire Nigerian community in Mid Western region of United States of America. For me today was long in the making as it started as an innocent observation of the life activities of a self made and very successfully businessman Chief Fabian Acharaugo Onwuachu, Osuofia Akokwa, the National and international Chairman PCNI Management Committee. As an observer, I was interested in his caring, social and philanthropic activities but what got me into Peoples Club today is the unquantifiable tenure of Chief Onwuachu as the National Social welfare Committee Chairman of PCNI, which the elders and founders of the club remembered when PCNI was at crossroads and needed the best of the best to rescue the club. The forgoing leaves no doubt why Chief Onwuachu is today occupying the prestigious position of the National and International Chairman PCNI Management Committee. His quest to be the best in whatever field of endeavor he found himself and his tenacious disposition shaped my life in many ways.

Thus, when I arrived in USA in 2003, the first question I asked Chief Ezeji is whether there is a People's club branch in Chicago and he answered in the negative. In 2004, six PCNI members residing in Chicago were inducted in Boston Branch namely Chief Emeka Ibekwe, Dr. Jude Nwokenkwo, Felix Oguebor, Sadiq Ademola, Harold Molokwu and Nkendiche Nwade. However, these 6 existing PCNI members could not organize Chicago Branch as required by the PCNI constitution due to intractable differences. Thus I singularly commenced this long and odious journey that brought us here today by tactful approach and exhaustive consultations of the main protagonists named above.

These efforts paid off on Saturday November 12, 2005 when the inaugural meeting of proposed PCNI Chicago was convened after I have secured assurances that the then prevalent political atmosphere will not be allowed to play any part in the organization and establishment of the first PCNI Branch in entire Mid-Western region of USA. My love to conveners of this inaugural meeting of the proposed club (Chief Erasmus Ezeji, Chief Dan Ibekwe and of course Dr. Ukeje Anayo Ukeje) for their unrestrained sacrifice that culminated to convening the meeting, passing resolutions that created fertile ground for consultations with the Honorable Chairman of the Club in Boston and the sponsoring Chairman PCNI Chicago Branch Chief, Sir Victor Udoji (K of C), (Ugballa of Eziundo Mbaise) and requesting him to petition ICNI HQ on our behalf as required. Consultations and discussions with both Boston and Nigeria continued until another group of 5 foundation PCNI members from Chicago were inducted in Boston, 2006, namely Chief Jeff Uju, Dr. Paul Ujari, Chief Erasmus Ezeji, Mr. Emeka Uhuka and of course Dr. Anayo Ukeje.

In a nutshell, the "Proposed Chicago Branch of the PCNI was convened on Saturday November 12, 2005; On November 26, 2005 it applied to be affiliated to Peoples Club of Nigeria International headquarters in Nigeria via



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Answer 10/14



Photo: Unity & Love

the three rings

Vol. 1 No. 3 July - September 1988

The In-House Newsletter of Peoples Club of Nigeria

ISSN 0795-2201

EDITORIAL

Encourage Indigenous Exporters

Recently an indigenous company owned by Chief Josiah Nnoruka blazed a new trail in the manufacturing sector by exporting his company's finished product to a First World Market.

Chief Nnoruka's Roadmaster Industries Limited based in Onitsha, manufactured and exported wheelbarrow tyres to Japan. What dumbfounded Nigerians and the world at large was that Japan, regarded as saturated in every manufacturable equipment, was ready to accept wheelbarrow tyres from a Third World Country. This goes to show that the Third World Countries still have a chance in export trade if only they can bend backwards and perfect their technology and the quality of their products.

For very many years, importation and exportation business between Japan and Nigeria have been tilting disgustingly in the interest of Japan. Statistics have always shown that Japan has exported several millions of naira (if not billions now) worth of goods to Nigeria, while Nigeria exports only a few thousand naira worth of raw materials in return.

The current export of wheelbarrow tyres will help in bridging the yawning gap in the balance of trade between Japan and Nigeria. We call for more indigenous companies and industrialists to emulate the example demonstrated by Roadmaster Industries Limited.

With this type of international export of manufactured goods, Nigeria is bound to improve on her balance of payment situation and earn more foreign and hard currency for the country. Certainly some of the goods will also be on sale in the local market

(Contd. on page 7)

PEOPLES CLUB OF NIGERIA GOES INTERNATIONAL

Peoples Club of Nigeria now goes international.

This followed the initiation into the club of 45 new members, 10 of which were members resident in the United States of America during the 5th Induction Ceremony of the Owerri Branch held on September 10, 1988.

Highlights of the ceremony was the official opening of the club's new lawn tennis court; and the launching of the finishing phase of the club's N2 million Ultra Modern Guest House.

The 10 new members from US are expected to form the nucleus of the Peoples Club of Nigeria abroad.

Addressing the new inductees the National President, Chief Dr. C.N. Obioha, (Akajugo - Arondizuogu) charged them to be prepared to serve humanity and the nation.

Chief Obioha declared; "Service rules the organisation. Service to members, service to the community", pointing out that neither religion nor politics was the concern of the club. "One

is free to choose any religion or hold any political belief", he said.



Chief Dr. C.N. Obioha

The President added that one must give one's toins and serve the nation and humanity in truth and justice. "To be serviceable, he said, is to be godly and to be godly is the highest state of man".

He advised them to acquaint themselves with the club's social security scheme (S.S.S.), adding that whatever benefits they would derive for being members of the club depended on their regular attendance at club activities and strict adherence to club regulations.

Earlier in his address, the chairman of the branch

Contd on page 8

Investment Committee To Be Set Up

An Investment Committee that will review the investment pattern of the Peoples Club of Nigeria is to be established.

This is one of the five-point communique adopted after the second seminar held at Onitsha by members of the Peoples Club of Nigeria on Saturday August 20, 1988.

The seminar whose theme was "Stability and Growth through Effective Social Security Administration" was attended by members from all the 22 branches of the club throughout the federation.

The first seminar with the theme - "The Role of The Peoples Club of Nigeria, In National Development" was held in May 1985.

The last Onitsha seminar agreed among other things on the expansion of the Social Security Scheme so that members would derive

benefits whilst alive.

It also decided in principle, on settling up craft/trade centres. Details, according to the communique, would be worked out later.

Directives were given to branches on the membership development programme on improving the organisation and administrative capacities.

These, according to the communique include: (a) The completion and improvement of club house facilities;

(b) Establishment of programmes which would stimulate the participation of members; (c) Special local inductions of quality members without much publicity should be encouraged in order to accommodate such quality members to join the club.

On S.S.S., the seminar emphasized that payment should be made by the members to the branches which will in turn pay same to the National Headquarters as early as possible in each quarter. But this should not be later than the end of the second month in each quarter, after which sanctions would apply.

Branches, the communique said, might open separate account for the SSS and endeavour to build up reserves in the account.

Penalties and fines at the branch level should be reduced to avoid accumulated debts and thus



on back page.

Answer No 14

000027



the three rings

MOHO: UNITY & LOVE

Vol. 1 No. 4 October — December 1988

The In-House Newsletter of Peoples Club of Nigeria

ISSN 0795-2201

EDITORIAL

Blazing The Trail

There are now hundreds of social clubs in Nigeria. However, one of them stands out, univalued, as the premier indigenous social club, with the widest public appeal in the country. That club is the PEOPLES CLUB OF NIGERIA.

Within a few years of its inception in 1971 to be precise, 22 branches of the Peoples Club have been established throughout the length and breadth of Nigeria, most of them with hundreds of members. Since admission is open to Nigerians of all ethnic origin and religious beliefs, it is easy for branches to spring up and thrive in most states and major cities of the Federation.

So popular has the Peoples Club become; so satisfying its social and fellowship programmes; so ennobling its philanthropic contributions to the upliftment of society and comfort of the underprivileged, that an ever-increasing number of high quality citizens in Nigeria and abroad are now seeking information on how to join the Peoples Club. In addition to the well established businessmen and women and natural rulers who constituted the initial membership, more and more professionals and intellectuals — engineers, lawyers, journalists, accountants, sociologists, medicals, university dons etc., are joining.

One of the most interesting of current developments is the interest being shown in the Peoples Club by well established Nigerian business class and intellectuals living overseas. They have identified the club as the only indigenous social club whose philo-

(Contd. on page 6.)

GOING INTERNATIONAL —

PCN TO TAKE OFF IN TEXAS

THE Peoples Club of Nigeria has completed all arrangements to establish a branch of the club in the United States of America. This followed a tentative approval granted by the National Executive Committee of the club held in Port Harcourt recently for the establishment of a branch abroad.

This was contained in the address by the National President, Chief Dr. C.N. Obioha (Akajugo — Arondizuogu) at the induction ceremony of the Peoples Club of Nigeria, Kaduna branch, on Saturday, November 12, 1988.

Chief Obioha said that

reports received so far from Houston Texas, raised hopes that in no distant date the branch would receive its charter to operate as a full branch.

He declared: "The foundation of the club is based on the ideals of truth, justice, fairplay, love and service. It aims to give concrete realisation of 'our

brothers' keepers' and encompassing concepts embracing all Nigerians and therefore a strong force for national unity and concord."

The occasion also marked the tenth anniversary celebration (1978-1988) of the Kaduna branch and the unveiling of the statue of the former chairman of the

branch, late Chief F.M. Oputum. Twenty-five new members, including a woman, were inducted into the Club.

In his speech, the President charged the new inductees to abide by the rules and regulations as entrenched in the Club's constitution. He told them to uphold the noble ideals of the Club by being good citizens of "our great country, Nigeria", responsible and disciplined members of their respective communities — not yielding to the vices that had bedevilled the society.

Chief Obioha elucidated on the symbolic meaning of the club's emblem — the multicoloured intertwined three rings. These he described as teaching Humility, Faith and Togetherness.

The National President later cut the tape to open the club hall extension built at the cost of N250,000.00, and also unveiled a beautiful bust statue of the founding Chairman of the branch, late Chief Oputum, the Ekwele I of Isu, outside the hall.

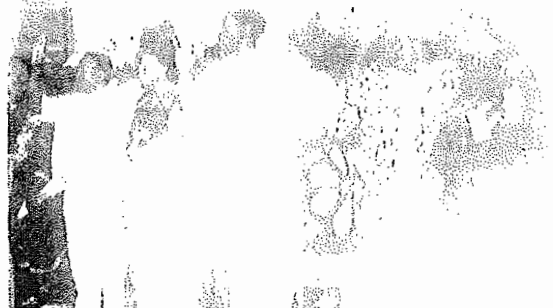
Ten founding members of the branch added glamour to the celebration when they blew out each a candle in turns to mark the tenth anniversary of the existence of the branch.

Earlier, in his well-speech, the Chairman, Kaduna Branch, Chris S.O.

lamented the founding of the club as a slight to the immigrants.

The Founder, Prince E.L. Uzo-Ekeke (Okyia I of Anikili) recalled the contributions of Chief Oputum to the club and congratulated him for all his efforts and contributions for all his efforts and contributions.

Contd. on page 6



New inductees in Kaduna take the oath of allegiance

Chief Odili Becomes A Patron

History was created at Ife Ukpo in Nigokola Local Government Area of Anambra State on December 3rd 1988 when the Odu I of Ife Ukpo Chief Elias N. Odili was installed a national patron of the Peoples Club of Nigeria.

Almost all the national patrons of the club national officers and members throughout the federation graced the occasion with their presence. It was really the patrons'

day as they added colour and dignity to the festivity, each one with his gold-plated staff of office moving majestically to greet the new patron.

In his address before presenting the new patron with his certificate, the National President of the club, Chief (Dr.) C.N. Obioha (Akajugo — Arondizuogu) charged him to always bear in mind that his contributions to the club must be positive and not negative.

He declared: "You will not in any way promote and diverse interests within the club. Neither will you encourage any pursuit for personal

gain. You are to play a fairly role always and do not lose touch with the grassroots of our noble club."

Chief Obioha said that "a patron is a national officer for life." He urged all affluent members to contribute both financially and materially towards the club house sports centre at the headquarters.

The Founder, Prince E.L. Uzo-Ekeke (Okyia I of Anikili) recalled the contributions of Chief Odili to the club and congratulated him for all his efforts and contributions.

Contd. on page 6

Answer No 14

000028

AN ADDRESS DELIVERED BY CHIEF I.O. NWAODU
CHAIRMAN PEOPLES CLUB OF NIGERIA OWERRI BRANCH
(SPONSORING BRANCH) AT THE ANNIVERSARY AND
PRESENTATION OF THE HOUSTON BRANCH TO THE
NATIONAL BODY OF PEOPLES CLUB OF NIGERIA IN
HOUSTON TEXAS U. S. A.

The President,
Special Guest of Honour,
The Founder, the father,
The National Secretary,
The Special invitees,
The Chairman Houston Branch,
Executive & members of Houston Branch,
Very Distinguished Ladies & gentlemen.

With joyful hearts and gratitude to God that we are here to grace this occasion today. Today's occasion is exclusively a landmark in the history of People's Club of Nigeria in general and Owerri Branch of People's Club of Nigeria in particular. Owerri Branch of People's Club of Nigeria have continuously been serving as a major source of inspiration to People's Club of Nigeria. We pray that God will always be with us and the branch we sponsor. The honour of sponsoring a new branch of People's Club of Nigeria is not a small task; Owerri Branch sponsored Orlu Branch, the club that won the best Branch-price in the Club last year at the National headquarters Onitsha.

As God-father to Houston Branch, the Club will be rest assured that you will do better and keep the Ethics of the Club. People's Club of Nigeria is not a town union and cannot associate herself with ugly behaviour or any sabotage to the rule of Government in the area it operates. Give service to yourself, to your neighbours and the government of the day. As your God-father, we will be free to advice you when in need. You, on your path will honour us by not letting the membership-certificate, the charter certificate and all the regalia of People's Club down. The club will not be happy with you if you do that.

At your inauguration, 26th May last year you invited me to come and discharge this assignment of introducing you to the National President. but due to communication gap we could not get through at the American Embassy in Nigeria because Visa was not granted to me. I thank God today that with your letter of invitation to me faxed to the Embassy in Nigeria I am a proud possessor of American Visa hence my presence at this occasion.

The National President, the founder, the father, the Secretary, on behalf of myself, the Executive and members of Peoples Club of Nigeria Owerri Branch (the sponsor), humbly and sincerely hand you over the twenty-third member in the family of Peoples Club of Nigeria Branches, to our dear president. We are the first to sponsor a Branch of the Club while flying on the mission on going international.

Thanks God for the history.

Yours faithfully,


Chief I.O. Nwaodu.
(CHAIRMAN).

Answer No 14

000023

PEOPLES CLUB OF NIGERIA

ADDRESS BY THE NATIONAL PRESIDENT, CHIEF (DR)
C. N. OBILOHA ON THE OCCASION OF THE FIRST ANNIVERSARY
CELEBRATION OF THE PEOPLES CLUB OF NIGERIA USA BRANCH ON
SATURDAY 25TH MAY, 1991

Mr Chairman, Mr Ineanyi O. Agvocha -- Chinyere Ugo 1 of Ogwa
Trustees/Patrons
Founder
The National Lord
Father
National Officers
Members of the National Executive Council of our great Club
Distinguished guest
Ladies and gentlemen

It is with great pleasure that I, on behalf of the People Club of Nigeria send you felicitation. Circumstances beyond my control has made it impossible for me to be present physically.

The cooperation of the Anambra State Liaison Officer is very much appreciated. He facilitated the process of obtaining visas for the Representatives of the Peoples Club of Nigeria.

✓ The purpose of the visit of this delegation is to regularise the establishment and the granting of the Charter to the Houston branch of the Peoples Club. Secondly, to issue certificates to the members who were inducted last year.

✓ At this point, I must express my appreciation for the performance of Chief F F B C Nwankwo, Chief C.A. Chukolu, Chief Okonkwo Mangrover, Chief (Mrs) Vero Onyia and Chief Vin Onyenora, at the ceremony of 26th May, 1990.

The Peoples Club of Nigeria was founded in 1971 by Nigerians who were impelled by the desire to foster good relationship amongst mankind and to sponsor and promote charitable and philanthropic causes, ventures, and projects. Membership is open to all irrespective of race, religion or tribe. The club is non-political.

The Club has 22 branches in Nigeria and a well established National Secretariat at Onitsha, Anambra State of Nigeria. The branches are spread as follows: Aba, Abakaliki, Abuja, Asaba, Awka, Bauchi, Benin, Calabar, Enugu, Ibadan, Jos, Kaduna, Kano, Lagos, Maiduguri, Makurdi, Nnewi, Onitsha, Orlu, Owerri, Port-Harcourt and Warri.

✓ Our membership strength encompasses men and women of proven integrity in various walks of life. Namely - doctors, engineers, accountants, lawyers traditional rulers, traders, civil servants etc.

Answer no 14

000030

The club provides a forum of equality that recognises individual talents and contributions. Thereby emphasising our interdependence to one another as no man can be an island unto himself. The tolerant and classless forum void of elitist snobbery tends to generate a buoyant and healthy society in which the members have mutual trust and respect for one another irrespective of their various stations in life.

The establishment of a branch of our club in the United States of America is a milestone in our quest to carry the gospel of our socio-philanthropic objectives to all parts of the world. Therefore, I charge you members of this new branch to uphold the noble ideals of this club and keep the flag of the club at all times flying.

We expect you as members of the club to be highly disciplined. You will abide by the rules and regulations as entrenched in the constitution of the club. You will uphold the noble ideals of the club by being good citizens and able ambassadors not yielding to the vices that have brought untold perils to the society.

You will acquaint yourselves with the workings of the social security scheme (SSS). You will participate in the Club's endowment fund activities. We, the members of the Peoples Club of Nigeria, will strictly continue to show the world that we have a proper and true sense of direction not based on affluence. If we have to play our part on a scale much larger than we have envisaged, we must ensure that we make more efficient use of our RESOURCES at all times. It stands therefore, to reason that Peoples Club of Nigeria has its obligation to mankind. We call on men and women of goodwill all over the world to join hands with us to ensure that this club survive the test of time and will remain a legacy for ourselves and future generations.

CHARGE TO OUR MEMBERS

May I specially congratulate you on having been found fit and proper persons to be members of this great club. To this end, you will abide by the rules and regulations as entrenched in the club's constitution. You will uphold the noble ideals of this club by being good citizens of the country, in which you reside; responsible and disciplined members of your respective communities.

You will acquaint yourself with the club's social security scheme. I will emphasise that the benefit you derive for being a member of this club will depend on your regular attendance to club activities, and strict adherence to club regulations.

I will now address you on the symbolic meaning of the emblem of the club -- the multicoloured intertwined rings of three. First,

Answer, No ² 14
000031

none of the rings has a beginning or an end. This symbolizes life itself. No one knows where and when it started, nor the end. It therefore, teaches HUMILITY, and unquestioned belief in a deity by whatever name one might choose to address him. It also teaches FAITH. One must have a firm belief that there is a meaning in life and to each and everyone of us is a special assignment, which is one's lot. The three rings intertwined teaches one TOGETHERNESS; no one is an island unto oneself. From our very entry into this world to our exit, we interact with others. Our success or failure depends on the perception others have of us and therefore the extent to which a helping hand might be extended to us. The Peoples Club of Nigeria expects each member to be productive. To produce is not only to take care of one's family responsibility but also to produce enough to extend to the hungry and unfortunate ones.

The club is not purely a temporal association. It does not begin and end with the living. The care and concern of members for those left behind; the interment of the member signifies the continuity of the membership even beyond this conscious existence. Service rules the organisation. Service to members, service to the community. Neither religion nor politics is the concern of the club. One is free to choose any religion or hold any political belief. But one must gird one's loins and serve the nation and humanity in truth and justice. To be serviceable is to be godly and to be godly is the highest state of man. I therefore, recommend to you the new members this definition of "PEOPLES" CLUB:

- P - stands for - pride of race and nation
- E - stands for - example which we must show by our lives
- O - stands for - otherness or togetherness - binding us one to another
- P - stands for - productivity - for we are "workmen" in the vineyard of the Lord
- L - stands for - Love - the cornerstone of the club and the greatest attributes of Almighty
- E - stands for - eternity - reminding us of the departed fellow members
- S - stands for - service - the very essence of life and the epitome of creation.

May I once again congratulate the chairman, Mr Iheanyi O Agwucha and the entire members in US who have worked so hard to establish this club in this part of the world. We at the national headquarters in Nigeria will continue to watch your leadership role with keen interest.

We also thank all those who have contributed in one way or the other to making this occasion a reality and pray the Grand Geometrician of the Universe to guide us all safely back to our destinations.

Ansara 10/14³

600032

May our labours begun in order be continued in peace and
be ended in harmony.

Long live the United States of America
Long live the Federal Republic of Nigeria
Long live the Peoples Club of Nigeria

Thank you.

Chief Dr C E Obioha
(Akaji-Ugo - Arondizuogu)
Ononaku of Orlu
Ugo-Ihedi-Ohaana 1 of Aba
Aka-na-enoghe Obodo of Oru, Ahiara
Ogwuure of Nguru, Mbaise
Ozurugbo of Ihite-Oha, Uratta, Owerri
(National President of the
Peoples Club of Nigeria)

Programme

1. Introduction of the MC by Hyacinth Onyekanne
2. Introduction of the Chairman & Supporters
3. Introduction of Members
4. Opening Prayers by Mr. Young Emeka Ahamba
5. Presentation of Kola/ Libation by Dr. Lucius Akuchie
6. Toast by Chief, Sir, F.F.B.C. Nwankwo
7. Welcome Address by Iheanyi O. Aguocha,
Onumonu I of Ogwa, Chairman Houston-USA Branch
8. An Address by the National President
9. The Induction Exercise
10. Presentation of Branch Charter and Certificates
11. Refreshment
12. Cultural extravaganza
13. Vote of Thanks
14. Closing Remarks
15. DANCE ! DANCE !! DANCE!!!

***** HAPPY 1ST ANNIVERSARY *****

Visiting Members From Nigeria

Prince T. I. E. Ike- Umezuoke
"Onyima of Amaichie"
 Founder, Trustee, Patron
 **
 Chief, Sir, F.F.B.C. Nwankwo, KSj, JP.
"Osuofia I of Nawfia"
 Father, Trustee, Patron
 **
 Chief Eddie Igwa
"Ogene of Aguleri"
 National Secretary
 **
 Chief I. O. Nwaodu
"Chinyereugo I of Anakohia"
 Chairman, Owerri branch
 **
 Chief E. Orji
 Secretary, Port Harcourt branch

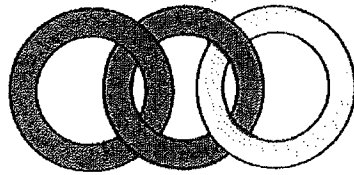
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600034

1st Anniversary Celebration

May 25, 1991

People's club of Nigeria

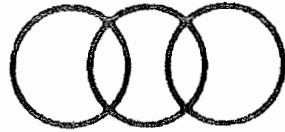


Motto: UNITY & LOVE & SERVICE

Houston-U.S.A.Branch

Answer no 14

000035



8 1/2" x 7"

UNITY LOVE AND SERVICE

**PEOPLES CLUB OF NIGERIA
U.S.A. BRANCH
HOUSTON**

**Establishment
and
First Induction Ceremony**

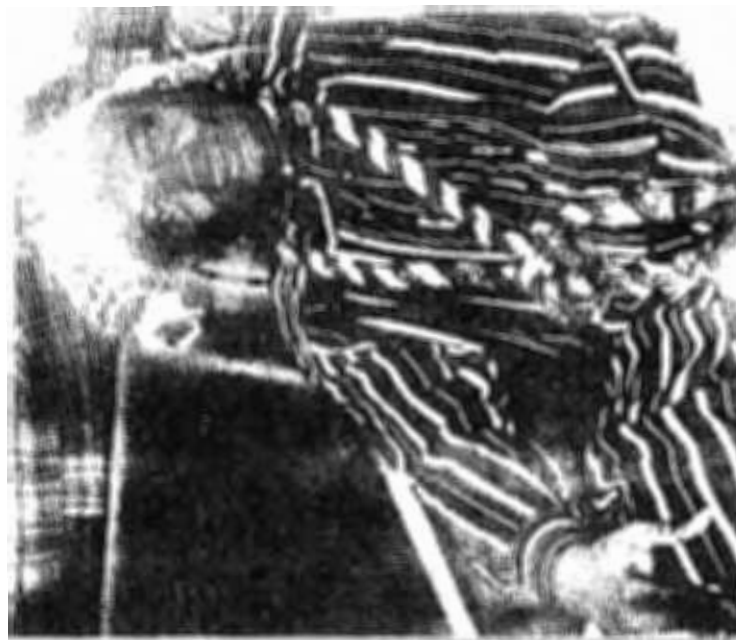
Saturday 26th May, 1990

Venue: Imperial Ballroom East
Hyatt Regency Downtown
Houston

Phone: (713) 654-1234
Time: 1:00 p.m. to 5:00 p.m.

Answer no 14

600036



**The National President
Chief Dr. C. N. Obioha
Akajiugo of Arondizuogu**

Names of New Inductees

Dr. Chris Anukwuem
Dr. Ezekiel Orji
Ms. Edith Ekech
Dr. Walter Henry
Chief Josiah Uwaezuoke
Mr. Chris Iwuanwanwu
Dr. Festus E. Obiakor
Mr. David Ezeobele
Mr. Johnny Nwachukwu
Mr. James Ohamuo
Dr. Lucius Akuehie
Mr. Noble Uchendu
Mr. Ernest Nwachukwu
Mr. Chike Asonye
Dr. Michael Umcorah
Mr. Godwin Ukaegbu

Answer 16/187

Program of Events

Introduction of M.C. by Mr. Maxwell Uzoegwu
Introduction of Chairman and Supporters by M.C.
Introduction of Members
Introduction of Inductees
Opening Prayer by Mr. Young Ahamba
Breaking of Kolanut / Libation by Chief Sir F.F.B.C. Nwankwo
Welcome Address by the Chairman of People's Club U.S.A. Branch
Establishment / Inauguration Address by the Father, Patron and Trustee of
Peoples Club of Nigeria, Chief, Sir F.F.B.C. Nwankwo
Cultural Extravaganza
Induction Exercise
Advice to Members by the Vice Chairman Mr. Max Ozuzu Uzoegwu
Light Refreshments and Speeches
Closing Remarks

Music by High Energy, Felix Osquared

Answe 10/1/4

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

*NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.*

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.

000033

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
LEGAL ENTITY INFORMATION	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
SPECIMEN FILE NAME(S)	
ORIGINAL PDF FILE	<u>SPE0-9767147154-131702076 . filename-1.pdf</u>
CONVERTED PDF FILE(S) (1 page)	<u>\\TICRS\EXPORT16\IMAGEOUT16\861\163\86116372\xml1\FTK0003.JPG</u>
SPECIMEN DESCRIPTION	letterhead
ADDITIONAL STATEMENTS SECTION	
*TRANSLATION (if applicable)	
*TRANSLITERATION (if applicable)	
*CLAIMED PRIOR REGISTRATION (if applicable)	
*CONSENT (NAME/LIKENSSES)	

000040

(If applicable)	
*CONCURRENT USE CLAIM (If applicable)	
DISCLAIMER	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
ATTORNEY INFORMATION	
NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
STREET	344 Maple Ave. West, Suite 151
CITY	Vienna
STATE	Virginia
COUNTRY	United States
ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
EMAIL ADDRESS	info@thetrademarkcompany.com
AUTHORIZED TO COMMUNICATE VIA EMAIL	Yes
CORRESPONDENCE INFORMATION	
*NAME	Matthew H. Swyers, Esq.
FIRM NAME	The Trademark Company
*STREET	344 Maple Ave. West, Suite 151
*CITY	Vienna
*STATE (Required for U.S. applicants)	Virginia
*COUNTRY	United States
*ZIP/POSTAL CODE	22180
PHONE	1-800-906-8626
FAX	1-877-351-5480
*EMAIL ADDRESS	info@thetrademarkcompany.com
*AUTHORIZED TO COMMUNICATE VIA	Yes

000041

EMAIL	
FEE INFORMATION	
NUMBER OF CLASSES	1
FEE PER CLASS	275
*TOTAL FEE PAID	275
SIGNATURE INFORMATION	
* SIGNATURE	/Matthew H. Swyers/
* SIGNATORY'S NAME	Matthew H. Swyers
* SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

600042

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

Serial Number: 86116372

Filing Date: 11/12/2013

To the Commissioner for Trademarks:

MARK: PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see mark)

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL. The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

16 Wright St.
Edison, New Jersey 08820
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

Original PDF file:

SPE0-9767147154-131702076 . filename-1.pdf

Converted PDF file(s) (1 page)

Specimen File1

000043

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.
The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
1-800-906-8626(phone)
1-877-351-5480(fax)
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013
Signatory's Name: Matthew H. Swyers
Signatory's Position: Attorney of Record

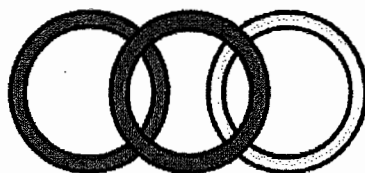
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RAM Accounting Date: 11/12/2013

Serial Number: 86116372
Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

600044

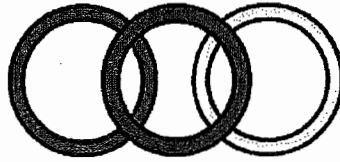
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-CC-21819-20131112131702076350

PEOPLES CLUB OF NIGERIA INTERNATIONAL



PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA
REGISTERED IN UNITED STATES
REGISTERED IN UNITED KINGDOM
REGISTERED IN CANADA



USA Address
16 Wright Street
Edison, NJ 08820

Chief F.A. Onwuachu
Chairman, Management Committee
Ichie P.D.C. Okochukwu
General Secretary, Management Committee

Headquarters
Onitsha/Owerrie Road
P.O. Box 5421
Onitsha, Anambra State
NIGERIA

USA Branches

Houston
Washington, DC
Miami
Princeton
Galveston
Dallas/Fort Worth
Boston
Philadelphia
Atlanta
New York
Cherry Hill
San Francisco
Princeton Junction
Chicago
Arlington
New Haven
Los Angeles
San Antonio
Virginia Beach
Austin Texas

Canada

Toronto Branch

United Kingdom

London Branch

*Info: The Trademark Company.com
ATTN: NEW MARK DESIGN*

Governing Council: HRH Igwe P.C. Ezenwa, Chairman

600047



**The Trademark
Company**

344 Maple Avenue West, Suite 151
Vienna, VA 22180
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TheTrademarkCompany.com

Matthew H. Swyers, Esq.*
Writer's Direct (800) 906-8626 x100
mswyers@TheTrademarkCompany.com

FRE 408 APPLIES

February 23, 2015

VIA CERTIFIED MAIL

PCNI Chicago Branch
Attn: Dr. Michael Ukeje Anayo
7717 Keeler Avenue
Skokie, IL 60076-3603

RE: Peoples Club of Nigeria Intl. v. PCNI Chicago Branch
Use of Mark: PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design
TMCO Matter No.: 22202

Dr. Anayo:

Please be advised that we represent Peoples Club of Nigeria International in regard to the protection of their federally protected intellectual property. In this regard, we are writing regarding PCNI Chicago Branches' use of the


PEOPLES CLUB OF NIGERIA INTERNATIONAL

mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:




Our client has been continuously using the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and

PEOPLES CLUB OF NIGERIA INTERNATIONAL

Design:  in connection to "Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members" since as early as 1994. Because of the excellent quality of the services provided under our client's mark in conjunction with the substantial resources dedicated to promoting the same our client's mark has become distinctive and synonymous with its mark and now embodies a very substantial amount of valuable business goodwill. More importantly the mark is protected by U.S. Reg. No. 4,591,874.


It has recently come to our client's attention that your organization, PCNI Chicago Branch, is using the mark

PEOPLES CLUB OF NIGERIA INTERNATIONAL

PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:  in connection with social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members. Your

*Admitted to practice in Virginia and the District of Columbia. Practice limited to federal trademark and copyright law.

000048

organizations use of the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design:  is confusingly similar, if not identical, to our client's registered mark as listed above and dilutes the distinctiveness of that mark.

Your club may be liable for compensatory damages measured by both our client's losses and your organizations' ill-gotten gains which are subject to trebling as well as attorneys' fees and court costs if our client is forced to bring a civil action against PCNI Chicago Branch to enforce its rights.

Thus, this is our formal demand that PCNI Chicago Branch:

- Cease any use of the mark PEOPLES CLUB OF NIGERIA INTERNATIONAL and Design

PEOPLES CLUB OF NIGERIA INTERNATIONAL



or "PEOPLES CLUB OF NIGERIA INTERNATIONAL" within 14 days;

- Remove all instances of the infringing mark from pages posted online within 14 days;
- Cease all use of the infringing mark on all club materials within 14 days;
- Destroy all club materials bearing the infringing mark within 14 days;
- Provide an accounting of any and/or all profits received as a result of the unauthorized use of our client's mark within 14 days; and
- Provide an accounting of any and/or all items left bearing the infringing mark within 14 days.

We ask that you confirm, in writing, that your organization will comply with our client's demands no later than March 9, 2015. Failure to do so or to otherwise contact our office concerning this matter will be regarded as non-compliance with our client's demands and will be responded to accordingly.

Thank you for your time and attention to this matter. Lastly, nothing herein shall be construed as an admission against the interests of our client all of whose rights are hereby expressly reserved.

Yours very truly,

/Matthew H. Swyers/

cc: AM



000049

E

X

H

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B

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T

R

Exhibit "R"

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

-----X
PEOPLES CLUB OF NIGERIA
INTERNATIONAL (PCNI),
PRINCETON JUNCTION BRANCH,
PCNI CHICAGO BRANCH, PCNI
MIAMI BRANCH,

Petitioners,

-vs-

PEOPLES CLUB OF NIGERIA
INTERNATIONAL, INC., a
New Jersey Corporation,

Registrant.

-----X
June 10, 2015
11:06 a.m.

DEPOSITION OF DR. AMBROSE MGBAKO, on behalf of
registrant herein, taken pursuant to Notice, and held
at the offices of Ramada Plaza, Newark Liberty
International Airport Hotel, 160A Frontage Road,
Newark, New Jersey, before Mary T. Slavik, RPR, a
Court Reporter and Notary Public.

MAGNA LEGAL SERVICES
(866) 624-6221
WWW.MAGNALS.COM

<p style="text-align: right;">Page 2</p> <p>1 APPEARANCES:</p> <p>2</p> <p>3 STARK & STARK, P.C.</p> <p>4 Attorneys for Petitioners</p> <p>5 PEOPLES'S CLUB OF NIGERIA</p> <p>6 INTERNATIONAL (PCNI), INC.</p> <p>7 993 Lenox Drive, Building 2, 3rd Floor</p> <p>8 Lawrenceville, New Jersey 08648</p> <p>9 (609) 895-7346</p> <p>10 By: CRAIG S. HILLIARD, ESQ.</p> <p>11 chilliard@stark-stark.com</p> <p>12</p> <p>13 THE TRADEMARK COMPANY</p> <p>14 Attorneys for Registrant</p> <p>15 PEOPLE'S CLUB OF NIGERIA</p> <p>16 INTERNATIONAL, INC.</p> <p>17 344 Maple Avenue West, Suite 151</p> <p>18 Vienna, Virginia 22180</p> <p>19 By: MATTHEW H. SWYERS, ESQ.</p> <p>20 (Appeared Telephonically)</p> <p>21 mswyers@thetrademarkcompany.com</p> <p>22</p> <p>23 ALSO PRESENT: Roxanna Yau, Court Reporter Student.</p> <p>24 Gordian Ndubizu, Petitioner.</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 DR. AMBROSE MGBAKO,</p> <p>2 having first been duly sworn by the Notary Public (Mary</p> <p>3 T. Slavik), and stating his address as 16 Wright</p> <p>4 Street, Edison, New Jersey 08820, was examined and</p> <p>5 testified as follows:</p> <p>6</p> <p style="text-align: center;">DIRECT EXAMINATION</p> <p>7</p> <p>8 BY MR. HILLIARD:</p> <p>9 Q. Dr. Mgbako, did I just pronounce your</p> <p>10 name correctly?</p> <p>11 A. That's correct, yes.</p> <p>12 Q. Good morning.</p> <p>13 A. Good morning.</p> <p>14 Q. My name is a Craig Hilliard, and I'm</p> <p>15 with the law firm Stark & Stark in New Jersey</p> <p>16 that represents three petitioners -- we call</p> <p>17 them petitioners in a legal proceeding --</p> <p>18 that's before a group called the Trademark</p> <p>19 Trial and Appeal Board right now. It's an</p> <p>20 action that these petitioners filed.</p> <p>21 I represent them, the People's Club of</p> <p>22 Nigeria International, Princeton Junction</p> <p>23 branch, who we'll call People's Club of Nigeria</p> <p>24 International Inc., PCNI, for short, if that's</p> <p>25 okay with you -- and there's a Miami branch and</p>
<p style="text-align: right;">Page 3</p> <p>1 INDEX</p> <p>2 TESTIMONY OF: DR. AMBROSE MGBAKO PAGE</p> <p>3 DIRECT EXAMINATION BY MR. HILLIARD 4</p> <p>4 CROSS-EXAMINATION BY MR. SWYERS 95</p> <p>5</p> <p>6</p> <p>7</p> <p>8 EXHIBITS</p> <p>9 NO. DESCRIPTION</p> <p>10 PAGE</p> <p>11 P-1 Trademark Application (9 pages) 63</p> <p>12 P-2 Response to Office Action (6 pages) 73</p> <p>13 P-3 Documents (002 to 003) 91</p> <p>14</p> <p>15 (Exhibits were retained by the Court</p> <p>16 Reporter to be attached to the transcript.)</p> <p>17</p> <p>18 INFORMATION REQUESTED: 91:15</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 a Chicago branch; and they have all grouped</p> <p>2 together to file this legal proceeding, you</p> <p>3 know, involving a trademark registration you</p> <p>4 were involved in filing.</p> <p>5 Do you understand that?</p> <p>6 A. That's correct.</p> <p>7 Q. Okay. We're here today to take your</p> <p>8 deposition testimony in connection with that</p> <p>9 legal proceeding.</p> <p>10 Do you understand that?</p> <p>11 A. Yes.</p> <p>12 Q. And do you understand that you've just</p> <p>13 given an oath to testify accurately and</p> <p>14 truthfully today?</p> <p>15 A. I do.</p> <p>16 Q. Okay. Have you ever gone through this</p> <p>17 process before of testifying in a deposition?</p> <p>18 A. Yes.</p> <p>19 Q. You have?</p> <p>20 How many times have you done this?</p> <p>21 A. I can't give you an exact amount of</p> <p>22 times.</p> <p>23 Q. Can you give me an estimate?</p> <p>24 A. I cannot give you.</p> <p>25 Q. Were any of those occasions in which</p>

Page 6

1 you gave deposition testimony in connection
 2 with anything involving PCNI?
 3 A. No.
 4 Q. They were all other matters perhaps
 5 related to your business or personal life?
 6 A. That's correct.
 7 Q. Okay. I'm going to give you just a few
 8 ground rules so that you're comfortable with
 9 the process today.
 10 Number one, even though we're in the
 11 informal setting of a conference room in a
 12 hotel, you should treat this as seriously as if
 13 you were in a courtroom testifying in front of
 14 the judge.
 15 Do you understand that?
 16 A. Yes.
 17 Q. If you don't understand a question that
 18 I've asked, please tell me and ask me to
 19 rephrase it. I'll be happy to do that.
 20 Sometimes I ask confusing questions; so if you
 21 don't understand what I'm asking, tell me that
 22 and I'll try to rephrase it to the best of my
 23 ability, but it's most important that you
 24 understand the question I'm asking; so that
 25 you're able to give a truthful, accurate answer

Page 7

1 to the extent that you can.
 2 Someone reading this transcript -- and
 3 there will be a transcript prepared with the
 4 questions and answers; someone reading this
 5 transcript at a later date, such as, members of
 6 a board, the TTAB, the Trademark Trial and
 7 Appeal Board, who will be deciding this case,
 8 will be reading that transcript, and we'll
 9 assume that if you answer the question, that
 10 you understood it and gave an accurate answer.
 11 Is that acceptable?
 12 A. Yes.
 13 Q. I don't want you to guess or speculate
 14 at anything. If you know the answer, tell me.
 15 If you don't know the answer, tell me that. If
 16 you don't recall the answer, tell me that as
 17 well. But guesses and speculation do none of
 18 the parties any good here today; is that
 19 acceptable?
 20 A. I understand.
 21 Q. Okay. Can you briefly describe for me
 22 your educational background, sir?
 23 A. I'm a physician.
 24 Q. And you hold a license to practice law
 25 in New Jersey?

Page 8

1 A. That's correct.
 2 Q. And when did you receive that license?
 3 A. 1976.
 4 Q. What type of medical practice are you
 5 involved in today?
 6 A. I'm a psychiatrist.
 7 Q. And have you been a practicing
 8 psychiatrist in New Jersey since 1976?
 9 A. Correct.
 10 Q. From what institution did you receive
 11 your medical degree?
 12 A. University of Ibadan of Nigeria.
 13 THE COURT REPORTER: The University of
 14 what?
 15 THE WITNESS: Of Ibadan, I-B-A-D-A-N.
 16 Ibadan, Nigeria.
 17 BY MR. HILLIARD:
 18 Q. When did you receive that degree?
 19 A. June 1972.
 20 Q. You were born in Nigeria; correct?
 21 A. Correct.
 22 Q. And when did you move permanently to
 23 the United States?
 24 A. 1975.
 25 Q. Are you a U.S. citizen?

Page 9

1 A. I am.
 2 Q. When did you become a U.S. citizen?
 3 A. I can't give you an exact year, but
 4 somewhere around 1980s. I can't really give
 5 you an exact date.
 6 Q. Somewhere in the 1980s you became a
 7 U.S. citizen?
 8 A. Naturalized.
 9 Q. Naturalized citizen?
 10 A. Yes.
 11 Q. Are you a dual citizen --
 12 A. Yes.
 13 Q. -- of Nigeria as well?
 14 A. Yes.
 15 Q. Okay. And are you a resident of New
 16 Jersey?
 17 A. Yes.
 18 Q. How long have you been a resident of
 19 New Jersey?
 20 A. Since 1975.
 21 Q. What is your current home address?
 22 A. 16 Wright Street, W-R-I-G-H-T, Edison,
 23 New Jersey 08820.
 24 Q. How long have you resided at 16 Wright
 25 Street in Edison?

Page 10

1 A. Since 1998.
 2 Q. And that is a private residence;
 3 correct?
 4 A. Yes.
 5 Q. Do you operate any business out of your
 6 residence?
 7 A. No, no. I have a private office there,
 8 but I don't see patients there.
 9 Q. A private medical office?
 10 A. Yes, but I don't see patients.
 11 Q. Okay. Did you ever?
 12 A. No.
 13 Q. Other than your medical practice, do
 14 you operate any business in any way out of the
 15 residence at 16 Wright Street in Edison?
 16 A. No.
 17 Q. Have you ever listed your residence
 18 with anyone as a place of business for any
 19 organization?
 20 A. No, I not -- no. Let me -- let me --
 21 let me qualify that. My 16 Wright Street is
 22 the address for People's Club of Nigeria
 23 International, and it's also the address of
 24 several associations that I belong to.
 25 Q. Can you name those other organizations?

Page 11

1 A. Anambra-Enugu States Association.
 2 THE COURT REPORTER: Wait, say that one
 3 --
 4 THE WITNESS: Anambra, A-N-A-M-B-R-A,
 5 E-N-U-G-U, States Association.
 6 THE COURT REPORTER: States
 7 Association?
 8 THE WITNESS: Yes.
 9 BY MR. HILLIARD:
 10 Q. What is it?
 11 A. States. It's a social organization.
 12 Q. What type of social organization is
 13 this?
 14 Do you know?
 15 A. Membership. Social. Nigerians from
 16 Anambra State.
 17 Q. Is this associated in any way with
 18 PCNI?
 19 A. No.
 20 Q. Is that an entity? Is it an entity?
 21 Is it an actual corporate entity?
 22 Anambra?
 23 A. It's a social organization.
 24 Q. Are you --
 25 A. I'm the -- I'm the agent. I'm the

Page 12

1 original one. I started it, so they use the
 2 official address. The official address comes
 3 to me from the states.
 4 Q. Are there any others you mentioned that
 5 you are --
 6 A. Not that I can recall.
 7 Q. Let me -- I don't mean to be rude, sir,
 8 but one of the instructions I just forgot to
 9 give you was to allow me to finish my entire
 10 question before you start your answer.
 11 It's very normal to get into
 12 conversational mode, but it makes it difficult
 13 for our court reporter to take everything down;
 14 so it's a different process. I know, but let
 15 me finish before you actually start your
 16 answer.
 17 You just mentioned -- before, you
 18 mentioned Anambra, that your 16 Wright Street
 19 address is also a registered address for
 20 People's Club of International -- Nigeria
 21 International; is that correct?
 22 A. Yes.
 23 Q. Can you be more specific about the
 24 entity itself that you just mentioned?
 25 Is it --

Page 13

1 A. What entity?
 2 Q. People's Club of Nigeria International.
 3 Does your residential address serve as
 4 the business location for any entity that's
 5 associated with PCNI?
 6 A. That's the registered address of PCNI.
 7 Q. Of PCNI? What PCNI? In other words --
 8
 9 A. The subsidiary. The People's Club of
 10 Nigeria International.
 11 Q. Which subsidiary?
 12 A. The subsidiary of People's Club of
 13 Nigeria International.
 14 Q. Is there only one subsidiary?
 15 A. There's only one subsidiary. That's
 16 the only one.
 17 Q. Okay. And is there a -- is that entity
 18 called People's Club of Nigeria International,
 19 Inc., I-N-C period?
 20 A. Yes.
 21 Q. Okay. And so your residential address
 22 is the registered office of People's Club of
 23 Nigeria International, Inc.?
 24 A. It's a registered address of People's
 25 Club of Nigeria International, Inc. If I

Page 14

1 remember, there's also People's Club of Nigeria
 2 Princeton. I'm the agent, and that's the
 3 registered agent, that address.
 4 Q. For PCNI Princeton?
 5 A. Princeton, yes.
 6 Q. Is that what's called a branch of PCNI?
 7 A. That's a branch of PCNI, yes.
 8 Q. Is that PCNI Princeton -- is that group
 9 also separately incorporated?
 10 Is it a separate company?
 11 A. Yes.
 12 Q. Is it -- does it have an actual name,
 13 other than -- you call it PCNI Princeton, but
 14 is it PCNI Princeton Corp.?
 15 Is it PCNI Princeton, Inc.?
 16 Do you understand what I'm asking?
 17 A. What I know is People's Club of Nigeria
 18 International, Princeton branch. That's the
 19 name.
 20 Q. Got it. Were you involved in any way
 21 in forming People's Club of Nigeria
 22 International, Inc., the company you just
 23 referred to as the subsidiary?
 24 A. Yes.
 25 Q. What was your role in forming that

Page 15

1 entity?
 2 A. I was the agent told to form that
 3 entity by the leadership of People's Club of
 4 Nigeria International.
 5 Q. Okay. When you say you were told by the
 6 leadership to form it, can you be more specific
 7 about who the leadership was that told you to
 8 form PCNI, Inc.?
 9 A. There was a meeting in 2010, and during
 10 that meeting, the decision was made to form a
 11 subsidiary branch.
 12 Q. Where was this meeting held?
 13 A. I believe it was in Houston. I'm not
 14 sure of the town. It was either Houston or
 15 somewhere in South New Jersey.
 16 There was a meeting then of the Central
 17 Executive Committee that was attended by
 18 trustees of the club -- some of them.
 19 Q. By "club," who do you mean? PCNI?
 20 A. Yes, PCNI.
 21 Q. Of Nigeria?
 22 A. Nigeria. Yes.
 23 Q. Okay. Thank you.
 24 A. And the management, the leader -- the
 25 leader of the management committee at the time.

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1 That's where that decision was made.
 2 Q. You were present for that meeting?
 3 A. Oh, yes.
 4 Q. At the time of that meeting in 2010
 5 with the Executive Committee, what position, if
 6 any, did you hold with PCNI Nigeria?
 7 What role or title, if any, did you
 8 have with PCNI Nigeria?
 9 A. Member.
 10 Q. Other than a member, did you hold any
 11 officer title?
 12 A. I believe I was a patron there. I'm
 13 not sure, but I was a patron -- going to be a
 14 patron.
 15 Q. What does that mean?
 16 For me -- for someone like me, who
 17 doesn't understand the structure, can you
 18 describe for me what is meant to be a patron?
 19 A. A patron is somebody who is appointed
 20 by the club -- by the leadership of the club to
 21 hold an elected position -- not elected --
 22 appointed, is an honorary position.
 23 Q. Honorary position?
 24 A. Yes.
 25 Q. Did you have any decision-making

Page 17

1 authority for PCNI Nigeria at the time this
 2 Central Executive Committee meeting was held in
 3 2010 in Houston?
 4 A. No.
 5 Q. Were you invited to attend the meeting?
 6 A. I attended the meeting because I'm a
 7 member of PCNI.
 8 Q. Okay. Does that mean that other people
 9 who were simply members had the right to attend
 10 that meeting?
 11 A. That's correct.
 12 Q. How many people were there at that
 13 meeting?
 14 A. I don't know.
 15 Q. Who made up the membership of the
 16 Executive Committee for that meeting that was
 17 held in 2010 in Houston?
 18 A. The leader was there.
 19 Q. Who was the leader?
 20 A. Onwuachu. Chief Onwuachu.
 21 THE COURT REPORTER: I'm sorry.
 22 THE WITNESS: Chief Onwuachu,
 23 O-N-W-U-A-C-H-U. He's the leader of the
 24 management committee.
 25 Q. Onwuachu. Onwuachu? Did I pronounce

Page 18

1 it right?

2 A. Yes.

3 Q. Okay. I apologize for my bad

4 mispronunciations in advance.

5 A. And I cannot give you the names of

6 everybody there, because I didn't take any

7 notes. Usually, those meetings are attended by

8 people from Nigeria. Of course, the leader, he

9 was there. I cannot give you the names of the

10 people who were there.

11 Q. Okay. But you only remember Chief

12 Onwuachu?

13 A. Yes. Yes, he was there.

14 Q. Now, am I correct that he was the top

15 leader of PCNI Nigeria at that time?

16 A. He was administrative leader, not the

17 top leader.

18 Q. He was the administrative leader. What

19 does that mean?

20 A. The leader that runs the day-to-day

21 affairs of the club.

22 Q. At that time in 2010?

23 A. Yes.

24 Q. Still today?

25 A. No.

Page 19

1 Q. Okay. Who was the administrative

2 leader today?

3 A. Ilonze. He's the President of PCNI.

4 THE COURT REPORTER: What was it?

5 THE WITNESS: Ilonze. I-L-O-N-Z-E.

6 Dr. Ilonze, the people's leader.

7 BY MR. HILLIARD:

8 Q. You just described Dr. -- Chief

9 Onwuachu as the administrative leader.

10 Who was the leader of PCNI Nigeria,

11 non-administrative -- the head of the

12 organization; or is there a CEO, in other

13 words?

14 A. No. There's a group known as Governing

15 Council.

16 Q. Okay. And that Governing Council, am I

17 correct has --

18 A. Has a --

19 Q. -- executive decision-making authority

20 for the organization?

21 A. And the people would refer to those who

22 make the final decisions.

23 Q. And set policies for the organization?

24 A. Yes, set policies.

25 Q. Were any of the Governing Council or

Page 20

1 any members of the Governing Council present at

2 the time of the Central Executive Committee

3 meeting in 2010?

4 A. Yes.

5 Q. Those folks were there?

6 A. Some of them, yes.

7 Q. Okay. Now, before this meeting was

8 held in Houston, or during which the decision,

9 as you testified was made to form a subsidiary

10 in the United States, did PCNI Nigeria have any

11 other organizational structure in the United

12 States?

13 A. Yes.

14 Q. It did. What was that organizational

15 structure?

16 A. PCNI has branches of the club in the

17 United States.

18 Q. Okay. And did for some time prior to

19 this meeting in 2010?

20 A. Yes.

21 Q. Okay. Can you name for me any of the

22 branches which existed prior to this meeting in

23 2010?

24 A. I can try. Houston.

25 Q. Was that the first --

Page 21

1 A. Yes.

2 Q. -- branch?

3 A. Yes.

4 Q. Okay. So the Houston branch, when it

5 was formed, was the first presence of -- I'll

6 call it a social club of the PCNI social club

7 in the United States when that was formed?

8 A. That's correct.

9 Q. Okay. Who else, other than Houston?

10 A. Washington, Miami, Princeton. I can't

11 really remember all the clubs there.

12 Q. There was several other branches, other

13 than the ones that you just named?

14 A. Yes. There were many of them.

15 Q. And was Princeton Junction a particular

16 branch that existed before this meeting in 2010

17 in Houston?

18 A. Yes.

19 Q. Okay. Had it existed for several years

20 before you had this Houston meeting during

21 which you -- the decision was made to form

22 PCNI, Inc.?

23 A. Yes.

24 Q. Okay. Do you have any knowledge about

25 how the different branches are formed -- have

<p style="text-align: right;">Page 22</p> <p>1 been formed in the past and maybe formed today?</p> <p>2 A. I'll tell you what I know.</p> <p>3 Q. What do you know about the -- and</p> <p>4 really what I'm asking you is how does one --</p> <p>5 how does one go about forming a branch if</p> <p>6 they're interested in forming a branch?</p> <p>7 A. If they're forming a branch, you have</p> <p>8 to do it through a protocol. You need a</p> <p>9 protocol formation. You will apply for a</p> <p>10 charter, because the license from --</p> <p>11 Q. To whom do you apply?</p> <p>12 A. The head in Nigeria.</p> <p>13 Q. In Nigeria?</p> <p>14 A. Yes. If they approve your charter,</p> <p>15 you're licensed, that gives you the right to</p> <p>16 form a branch of People's Club of Nigeria</p> <p>17 International. Okay.</p> <p>18 And the day the club is chartered,</p> <p>19 people will come from Nigeria, their leader and</p> <p>20 ambassador of the Executive Committee and the</p> <p>21 Board of Trustees. The represented group will</p> <p>22 be there. There's a ceremony, and the branch</p> <p>23 will be chartered. And the branch -- that's</p> <p>24 the way it is formed.</p> <p>25 Q. Is there a particular document, for</p>	<p style="text-align: right;">Page 24</p> <p>1 A. No.</p> <p>2 Q. Are there officers of the branch?</p> <p>3 A. Of Princeton branch?</p> <p>4 Q. Yes. Have you ever been an officer of</p> <p>5 the Princeton branch?</p> <p>6 A. I was an interim. There was -- the</p> <p>7 Princeton branch went through a crisis period.</p> <p>8 Some people left. Some people stayed.</p> <p>9 And I -- I was the leader of the group</p> <p>10 that restructured that branch and got it -- got</p> <p>11 it going. I was -- I was never elected. I was</p> <p>12 appointed to do that, and I did it.</p> <p>13 Q. Who appointed you to do that?</p> <p>14 A. After it was integrated, the members --</p> <p>15 they came together and said, "You lead the</p> <p>16 group."</p> <p>17 Q. Strictly the Princeton branch?</p> <p>18 A. Yes.</p> <p>19 Q. When did that happen?</p> <p>20 A. I can't give you the exact date. That</p> <p>21 was around 2002 or so -- 2002; 2002 to 2003,</p> <p>22 but I cannot -- I have to go back and look at</p> <p>23 the date.</p> <p>24 Q. Okay. So as of today, you are a member</p> <p>25 of the Princeton branch; correct?</p>
<p style="text-align: right;">Page 23</p> <p>1 lack of a better word, a charter that is</p> <p>2 provided to the branch which recognizes it as a</p> <p>3 branch?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. Were you personally involved in</p> <p>6 organizing any branch of PCNI of Nigeria in the</p> <p>7 United States?</p> <p>8 A. No.</p> <p>9 Q. Am I correct, that you have been</p> <p>10 associated with a particular branch of --</p> <p>11 during your time as a member?</p> <p>12 A. I've been a member of one branch.</p> <p>13 Q. Is that the Princeton branch?</p> <p>14 A. The Princeton branch.</p> <p>15 Q. But you did not participate in forming</p> <p>16 that branch or in seeking the charter for that</p> <p>17 branch; is that correct?</p> <p>18 A. No.</p> <p>19 Q. You joined it at some time after it had</p> <p>20 been formed?</p> <p>21 A. I joined it in 1998, yes.</p> <p>22 Q. Okay. And what -- what, if any, role</p> <p>23 do you have today in the Princeton branch?</p> <p>24 A. I'm a member.</p> <p>25 Q. Are you an officer?</p>	<p style="text-align: right;">Page 25</p> <p>1 A. Yes.</p> <p>2 Q. Does the Princeton branch have a</p> <p>3 registered business address?</p> <p>4 A. They have to have a registered business</p> <p>5 address, yes.</p> <p>6 Q. Is it your home?</p> <p>7 A. No.</p> <p>8 Q. It's some other address?</p> <p>9 A. Yes.</p> <p>10 Q. Do you know where that address is?</p> <p>11 A. I don't know.</p> <p>12 Q. Does it have -- does it have a physical</p> <p>13 facility? Does it own a facility?</p> <p>14 A. Does not own a facility, as far as I</p> <p>15 know.</p> <p>16 Q. And did it ever?</p> <p>17 A. No.</p> <p>18 Q. Where are its functions held?</p> <p>19 A. At this hotel.</p> <p>20 Q. Okay.</p> <p>21 THE COURT REPORTER: I'm sorry. Where?</p> <p>22 MR. HILLIARD: At this hotel.</p> <p>23 THE WITNESS: At this hotel. Ramada</p> <p>24 Inn.</p> <p>25</p>

<p style="text-align: right;">Page 26</p> <p>1 BY MR. HILLIARD:</p> <p>2 Q. They're at Ramada Inn here?</p> <p>3 A. This is where the meetings are held,</p> <p>4 and this is where many of the activities are</p> <p>5 held.</p> <p>6 Q. Okay. Do you know if the Princeton</p> <p>7 branch is a separately formed entity?</p> <p>8 By "entity," I mean, a corporation or a</p> <p>9 limited liability company. Do you know its</p> <p>10 formation structure?</p> <p>11 A. It's a registered nonprofit</p> <p>12 organization.</p> <p>13 Q. They are?</p> <p>14 THE COURT REPORTER: I'm sorry.</p> <p>15 THE WITNESS: They are a registered</p> <p>16 nonprofit organization.</p> <p>17 THE COURT REPORTER: Just keep your</p> <p>18 voice up for me.</p> <p>19 THE WITNESS: Okay.</p> <p>20 THE COURT REPORTER: Thank you.</p> <p>21 BY MR. HILLIARD:</p> <p>22 Q. Thank you. Do you know as a registered</p> <p>23 not-for-profit organization it has a -- it's</p> <p>24 called something like, Inc., Corps, or LLC, if</p> <p>25 you know?</p>	<p style="text-align: right;">Page 28</p> <p>1 formation of People's Club of Nigeria</p> <p>2 International, Inc., the subsidiaries?</p> <p>3 A. All I can tell you is what I was told</p> <p>4 to do. I was told to incorporate a subsidiary</p> <p>5 of People's Club of Nigeria in the United</p> <p>6 States. And to go from there and open an</p> <p>7 account, we would use as part of doing</p> <p>8 business. And I was also asked at that time to</p> <p>9 look into forming a 501(c)(3) company; so that</p> <p>10 People's Club of Nigeria International can</p> <p>11 perform some charity functions in the United</p> <p>12 States.</p> <p>13 These were the instructions that were</p> <p>14 given to me, and that's what I did. I</p> <p>15 registered People's Club of Nigeria</p> <p>16 International subsidiary.</p> <p>17 Q. And you did that in 2010?</p> <p>18 A. I did that in August 2010.</p> <p>19 Q. Okay.</p> <p>20 A. I went to a lawyer, explained the</p> <p>21 directions given to me, and the lawyer</p> <p>22 registered the corporation, and looked at the</p> <p>23 constitution, and then --</p> <p>24 Q. I'm sorry. I missed that.</p> <p>25 A. Looked at the constitution.</p>
<p style="text-align: right;">Page 27</p> <p>1 A. I don't know.</p> <p>2 Q. So going back to the meeting you just</p> <p>3 described for me in Houston in 2010, involving</p> <p>4 the executive committee, you attended that</p> <p>5 meeting as a member along with other members;</p> <p>6 correct?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And was there, if you recall, an</p> <p>9 agenda for that meeting?</p> <p>10 A. I don't know.</p> <p>11 Q. Do you recall seeing anything in</p> <p>12 advance of the meeting that described why the</p> <p>13 meeting was being held?</p> <p>14 A. I don't recall.</p> <p>15 Q. Was this a regular -- I'll call it an</p> <p>16 annual meeting -- was this something that was</p> <p>17 held regularly that you were attending, or was</p> <p>18 this a specialty meeting?</p> <p>19 A. They come when they choose to come.</p> <p>20 The meeting is announced and then people go.</p> <p>21 And that's all. I'm not part of that</p> <p>22 administration; so I know that the meeting is</p> <p>23 held; we go.</p> <p>24 Q. What, if anything, do you recall about</p> <p>25 the discussions at the meeting about the</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Who looked at the constitution?</p> <p>2 A. The lawyers.</p> <p>3 Q. What constitution?</p> <p>4 A. The People's Club of Nigeria</p> <p>5 Constitution.</p> <p>6 Q. Okay.</p> <p>7 A. International.</p> <p>8 Q. Who was the lawyer that you hired?</p> <p>9 A. Sebastian.</p> <p>10 Q. That's his last name?</p> <p>11 A. Yeah. That's the first name.</p> <p>12 Q. What was the last name?</p> <p>13 A. It escapes me.</p> <p>14 Q. First name was Sebastian --</p> <p>15 A. Ibezim. Ibezim. I-B-E-Z-I-M.</p> <p>16 THE COURT REPORTER: I-B-E-Z --</p> <p>17 THE WITNESS: I-B-E-Z-I-M. He's the</p> <p>18 attorney that registered the corporation.</p> <p>19 BY MR. HILLIARD:</p> <p>20 Q. Is he a New Jersey attorney?</p> <p>21 A. Yes.</p> <p>22 Q. Do you know whether he still practices</p> <p>23 law in New Jersey today?</p> <p>24 A. I think he's temporary in Nigeria.</p> <p>25 Q. I'm sorry?</p>

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1 A. I know he's in Nigeria.
 2 Q. He's in Nigeria physically now?
 3 A. Physically, yes. He's been in Nigeria
 4 when one of the governors in the meeting gave
 5 him a position; so he went there. So he's
 6 probably going to be coming back.
 7 Q. But you don't know -- you don't know
 8 when?
 9 A. I don't know when.
 10 Q. Do you know why you were asked by the
 11 Executive Committee to be the one to form the
 12 PCNI, Inc. subsidiary in the United States?
 13 A. I don't know why.
 14 Q. Did you volunteer?
 15 A. I did not volunteer. I was directed to
 16 do this.
 17 Q. You were picked out of all the members?
 18 A. I was picked out of all the members to
 19 do it, and I did it.
 20 Q. So as you sit here today, you have no
 21 idea why they picked you?
 22 A. I have no idea why they picked me.
 23 Q. Who came up with the idea?
 24 A. They did.
 25 Q. They did. They had the idea. Okay.

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1 Do you know -- did they say anything --
 2 and by "they," I mean executive committee.
 3 Did they say anything at the meeting as
 4 to why they wanted to do this? Not about why
 5 you wanted to do it, but why they wanted to
 6 form a company or an organization in the United
 7 States as a subsidiary?
 8 A. The club was expanding; many branches
 9 and many more people. Many more people wanted
 10 to form other branches, and they wanted to get
 11 organized -- a registered business, and make
 12 sure that the activities are legal here. Other
 13 presence -- the details of why they want to do
 14 it, I don't know. I was told to do it.
 15 Q. Okay.
 16 A. And I did it.
 17 Q. Up to that point in time, 2010, when
 18 you were asked to form the subsidiary
 19 organization in the United States, am I correct
 20 that PCNI's social club activities were
 21 conducted exclusively through all the different
 22 branches?
 23 A. Yes.
 24 Q. There was no umbrella organization in
 25 the United States?

Page 32

1 A. No.
 2 Q. And at that time you were a member in
 3 the Princeton branch; correct?
 4 A. Correct.
 5 Q. Did the Princeton branch use a
 6 particular logo for its social club activities?
 7 A. I have one logo for People's Club.
 8 Q. And is that the interlocking five-ring
 9 logo?
 10 A. Three-ring.
 11 Q. Five? Three?
 12 A. Three.
 13 Q. Three. I apologize. The interlocking
 14 three-ring? I'm thinking of the Olympics.
 15 Sorry about that.
 16 The interlocking three-ring logo. That
 17 was the logo that the Princeton branch used;
 18 right?
 19 A. That's the logo for the club.
 20 Q. All right. And is that, to your
 21 knowledge, is that the same logo that all of
 22 the other branches around the United States
 23 use?
 24 A. The People's Club, that's the logo.
 25 Q. Okay. And they used those for years --

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1 all the branches used those -- that same logo
 2 up to 2010?
 3 A. Since 1971.
 4 Q. 1971?
 5 A. Yes.
 6 Q. Is that when the first branch was
 7 formed?
 8 A. That's when the first club was started.
 9 Q. In the United States?
 10 A. In Nigeria.
 11 Q. In Nigeria. Okay. 1971?
 12 A. And the people that started the first
 13 club had to go through a process to
 14 establishing the first club in the United
 15 States.
 16 Q. Okay. After you were given the
 17 direction to open or form the subsidiary, you
 18 hired a lawyer. You told me you looked at the
 19 constitution for PCNI in Nigeria, and you took
 20 certain steps to complete what you were
 21 directed to do. You told me that you opened a
 22 bank account.
 23 You formed the entity first; right?
 24 A. (Witness nodded.)
 25 Q. You have to verbalize. I'm sorry.

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1 A. When you finish, you let me know.
2 Q. You formed an entity; correct?
3 A. Yes.
4 Q. And then you opened a bank account?
5 A. Yes.
6 Q. With a New Jersey bank?
7 A. Yes.
8 Q. And was that bank account opened in the
9 name of the new entity?
10 A. Yes.
11 Q. And did you have signatory authority
12 over that bank account?
13 A. I'm one of the signatures.
14 Q. Are there others?
15 A. Oh, yes.
16 Q. Who were the others?
17 A. Onwuachu, the chairman, who was the
18 chairman there. Onwuachu Ilonze.
19 Q. Onwuachu, right.
20 A. Ilonze, I-L-O-N-Z-E, who was then the
21 treasurer. And Ogugua -- Desmond Ogugua.
22 D-E-S-M-O-N-D; Ogugua, O-G-U-G-U-A, who also
23 was a trustee of the club. They came to New
24 Jersey and put in their signature.
25 Q. They physically went to the bank --

Page 35

1 A. Physically went to the bank and put
2 their signatures in.
3 Q. -- and put their signatures in.
4 Am I correct that all three of these
5 gentlemen you just named are Nigerian
6 residents?
7 A. Yes.
8 Q. They live in Nigeria year round?
9 A. They live in Nigeria year round, yes.
10 Q. Okay. And they function as leaders
11 within PCNI Nigeria overseas?
12 A. They function as PCNI Nigeria
13 worldwide.
14 Q. Worldwide.
15 A. Britain, Canada, United States,
16 whatever there's a People's Club of Nigeria;
17 they're the leader.
18 Q. Okay. Did you -- you mentioned earlier
19 that you undertook some steps to form -- to
20 seek 501(c)(3) status for this newly formed
21 entity?
22 A. Those were the directions given to me.
23 Q. And did you do that?
24 A. It was to be started, but the
25 constitution needs -- needed to be modified in

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1 order to do that. We're still in the process,
2 that has not been done.
3 Q. What, in your understanding needed --
4 needed, or still needs to be done to the
5 constitution to permit you to make application
6 for tax exempt status under 501(c)(3)?
7 A. The -- I can't remember what the lawyer
8 said. The -- the way we had to do some kind of
9 constitution in Nigeria. It was in the process
10 of being revised. And he -- when that is
11 complete, we'll take whatever was done, and
12 there needed to be a statement in that
13 constitution, but 501(c)(3) criteria --
14 Q. Okay.
15 A. -- so that they can work here. That --
16 that's what I was told.
17 Q. That has not been done yet?
18 A. That has not been done.
19 Q. Have you -- so am I correct that you
20 are -- as far as the U.S. Government Taxing
21 Authorities are concerned, you are -- you
22 believe that you are a for-profit corporation
23 right now?
24 A. No, not-for-profit.
25 Q. You're not-for-profit?

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1 A. Not-for-profit.
2 Q. You were not-for-profit, but you have
3 not applied for tax exempt status as a
4 not-for-profit; is that correct?
5 A. The taxes has not been applied, as far
6 as I know.
7 Q. All right. Do you submit -- by "you,"
8 I mean, does PCNI, Inc., the New Jersey -- and
9 this was a New Jersey Corporation you formed;
10 correct?
11 Does PCNI, Inc., the New Jersey
12 company, file tax returns with the government?
13 A. They file no returns.
14 Q. They do not file any returns?
15 A. They do file returns.
16 Q. They do file returns? Okay.
17 And do you have an accountant who does
18 that?
19 A. Yes.
20 Q. Who is your accountant?
21 A. Mr. Okeke. O-K-E-K-E. He's the one
22 that's done our returns to date.
23 Q. And am I correct, that he has been
24 filing tax returns for this subsidiary, PCNI,
25 Inc. since it was formed in 2010?

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1 A. That's not -- they -- they -- PCNI has
 2 not made any money from the tax return.
 3 Q. But have you been filing informational
 4 returns with the government?
 5 A. Yes, yes.
 6 Q. Do you review those returns before
 7 they're filed with the government?
 8 A. He does.
 9 Q. Do you personally?
 10 A. I get the form and give it to him.
 11 Q. Do you sign them?
 12 A. I don't. He signs them on behalf, I
 13 think.
 14 Q. He does?
 15 A. Yes.
 16 Q. The accountant?
 17 A. Yes.
 18 Q. But you review them before they're
 19 filed?
 20 A. Reviewed what?
 21 Q. The informational tax returns.
 22 A. I don't understand what you're talking
 23 about.
 24 Q. Do you review the tax returns before he
 25 files them, whether he files them

Page 39

1 electronically or on paper?
 2 Do you see them before -- do you have
 3 to approve them?
 4 A. It's done electronically.
 5 Q. Right.
 6 A. I get the paper and supply the form to
 7 him.
 8 Q. But you approved them?
 9 A. And I give him the form. He registers,
 10 and he gave me the registered certificate.
 11 Q. Do you have copies of the tax returns,
 12 the informational returns that have been filed
 13 by PCNI, Inc.? Do you personally have them?
 14 A. I have a copy of the returns and my
 15 return from the United States, yes.
 16 Q. For each of the years in which they
 17 were filed?
 18 A. Yes.
 19 Q. And you also filed informational
 20 returns at the State of New Jersey as a New
 21 Jersey entity?
 22 A. That's what I'm referring to, yes.
 23 Q. Well, there may be two different -- you
 24 may file with the State of New Jersey. Do you
 25 also file with the Internal Revenue Service?

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1 A. Internal Revenue Service. We haven't
 2 made any money.
 3 Q. I understand -- I understand that, but
 4 I'm asking if you filed any informational
 5 returns to show the IRS, we haven't made any
 6 money, so we owe nothing, but here's our
 7 return.
 8 A. I don't remember that.
 9 Q. Okay. Would you have -- do you believe
 10 you would have records at your residence at 16
 11 Wright Street, which would include any tax
 12 files that were made by the entity with the
 13 government?
 14 A. I have -- should have records, yes, of
 15 whatever we need for the government.
 16 Q. Okay. Other than what you've described
 17 for me already, sir, did you do anything else
 18 in 2010 to set up PCNI, Inc., the New Jersey
 19 subsidiary and start to operate it?
 20 A. The only thing we did was the trademark
 21 application.
 22 Q. The reason we're here today, in part,
 23 the trademark application?
 24 A. That was the initial application we did
 25 , an application then to protect our trademark.

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1 Q. Whose trademark?
 2 A. People's Club of Nigeria International
 3 trademark.
 4 Q. Okay. Were you directed at that
 5 executive committee meeting in Houston to
 6 pursue a trademark registration?
 7 Did that come up at that meeting?
 8 A. That was one of the three things that I
 9 was told to do.
 10 Q. Okay. At that meeting?
 11 A. At that meeting, yes.
 12 Q. Okay. Do you recall if anything was
 13 said at that meeting about why the Executive
 14 Committee wanted to file an application for
 15 registration of its trademark People's Club of
 16 Nigeria International in the United States at
 17 that time?
 18 Were you told why?
 19 A. To protect the use of our mark by
 20 non-members.
 21 Q. When you say non-members, who do you
 22 mean?
 23 A. The first Club of Nigeria
 24 International. People who are not active
 25 members of People's Club of Nigeria

<p style="text-align: right;">Page 42</p> <p>1 International.</p> <p>2 Q. Okay. At that time, though, were all</p> <p>3 of the branches, including the ones you</p> <p>4 mentioned before at the time of that executive</p> <p>5 committee meeting, were they all members?</p> <p>6 A. Of course this is. They're all</p> <p>7 branches for the Club of Nigeria.</p> <p>8 Q. So they were all members?</p> <p>9 A. Yes.</p> <p>10 Q. So as you understand --</p> <p>11 A. If they paid their dues.</p> <p>12 Q. They pay their dues.</p> <p>13 A. They can be a member this year and not</p> <p>14 a member next year.</p> <p>15 Q. If you don't pay your dues?</p> <p>16 A. The only reason you're a member is if</p> <p>17 you pay the annual dues. It's called asset</p> <p>18 dues.</p> <p>19 Small amount of money, but you have to</p> <p>20 pay it every year. If you don't pay at the end</p> <p>21 of April, you are out of status, and you are</p> <p>22 not a member. And if your branch at that time</p> <p>23 falls below 20 members, you're not a branch</p> <p>24 anymore. Then your license can be withdrawn.</p> <p>25 That is criteria.</p>	<p style="text-align: right;">Page 44</p> <p>1 A. All.</p> <p>2 Q. By all, including the Princeton branch,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. The Princeton Junction branch; correct?</p> <p>6 A. Yes.</p> <p>7 Q. And Miami branch?</p> <p>8 A. Yes.</p> <p>9 Q. The Chicago branch?</p> <p>10 A. Yes.</p> <p>11 Q. They all had been using the logo for</p> <p>12 years up until that point in time?</p> <p>13 A. They were -- they were members of the</p> <p>14 branches of the People's Club of Nigeria.</p> <p>15 Q. Okay.</p> <p>16 A. They were entitled to it, yes.</p> <p>17 Q. Did the status of any of those branches</p> <p>18 -- and whether they were branches who were</p> <p>19 entitled to use the trademark -- come up at</p> <p>20 that meeting in Houston in 2010?</p> <p>21 A. I don't understand your question.</p> <p>22 Q. Sure. Let me rephrase it. I'm glad</p> <p>23 you asked me to rephrase it because it was a</p> <p>24 confusing question.</p> <p>25 At the time of the meeting in Houston</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. Twenty members?</p> <p>2 A. Twenty members for branches. Twenty</p> <p>3 active members for branches. And each member</p> <p>4 has to pay assets.</p> <p>5 THE COURT REPORTER: Assets?</p> <p>6 THE WITNESS: Social security. It's</p> <p>7 called social security.</p> <p>8 BY MR. HILLIARD:</p> <p>9 Q. Okay. Okay. So at the time of this</p> <p>10 Executive Committee meeting in Houston in 2010,</p> <p>11 it was when the Executive Committee asked you</p> <p>12 to pursue a trademark application. It was your</p> <p>13 understanding as a member -- correct me if I'm</p> <p>14 wrong, as your understanding as a member that</p> <p>15 up to that point in time, there were a number</p> <p>16 of branches consisting of dues-paying members,</p> <p>17 who if they paid their dues, maintained their</p> <p>18 standing, were entitled to use the trademark?</p> <p>19 A. Yes.</p> <p>20 Q. The three-ring logo and the name;</p> <p>21 correct?</p> <p>22 A. Yes, yes.</p> <p>23 Q. Okay. In fact, that name had been used</p> <p>24 by all or most of the branches up to that point</p> <p>25 in time; correct?</p>	<p style="text-align: right;">Page 45</p> <p>1 when you were asked to pursue a trademark</p> <p>2 application, did you have a belief that there</p> <p>3 was anyone out there who was not entitled to</p> <p>4 use the trademark as a branch?</p> <p>5 Any of the branches that were using it</p> <p>6 unlawfully or were not properly used; did that</p> <p>7 -- did that subject come up?</p> <p>8 A. No, none of the branches were. You</p> <p>9 can't use it if you are not a branch.</p> <p>10 Q. And you can't use it if you're not a</p> <p>11 branch, and you can't be a branch if you don't</p> <p>12 use it? You're required to use it?</p> <p>13 A. You're required to use it, yes.</p> <p>14 Q. You have to use it?</p> <p>15 A. You have to use it.</p> <p>16 Q. Otherwise, if you don't use the logo of</p> <p>17 the trademark, you can be expelled as a branch;</p> <p>18 correct?</p> <p>19 A. I don't understand that.</p> <p>20 Q. But you have to use it?</p> <p>21 A. You have to use it. Correct.</p> <p>22 Q. Okay. Were there any issues with any</p> <p>23 of the branches at that time in 2010, when you</p> <p>24 were asked to pursue the trademark application?</p> <p>25 A. No.</p>

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1 Q. Okay.

2 A. All our branches were related.

3 Q. And if I understand your testimony

4 correctly, if your branch was chartered by PCNI

5 Nigeria, and you had at least 20 active

6 members, and your members paid their dues, you

7 were entitled under the constitution to

8 maintain your standing as a branch; correct?

9 A. Yes.

10 Q. And entitled to use the trademark?

11 A. Yes.

12 Q. Okay. Why don't we take a quick break.

13

14 (A short break was taken.)

15

16 MR. HILLIARD: We are back on the

17 record.

18 BY MR. HILLIARD:

19 Q. Dr. Mgbako, I forgot to ask you earlier

20 in the beginning of the deposition, and I

21 apologize for this, but I wanted to make sure

22 that I clarified for the record, the position

23 in which you're testifying today.

24 By that, I mean, I provided Mr. Swyers

25 with what's called a notice to take deposition.

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1 It's a formal notice that's issued in the

2 proceeding, and I issued the notice to have you

3 here individually, personally. I also issued

4 the notice to People's Club of Nigeria

5 International, Inc. for you to be here as -- or

6 for the organization to produce someone who is

7 authorized to testify on the company's behalf.

8 And the reason I did that is because in

9 some instances, the organization may designate

10 five different people to testify in five

11 different subjects, but my understanding is

12 that you and Mr. Swyers have designated you as

13 the only person with knowledge of the facts to

14 be here today to testify; is that correct?

15 A. Of the trademark, yes.

16 Q. About the trademark?

17 MR. SWYERS: Clarify he's not the only

18 person, but I think you asked for a person

19 with knowledge, not the only person with.

20 MR. HILLIARD: That's correct.

21 Consistent with the rule. I didn't mean to

22 misspeak about that.

23 BY MR. HILLIARD:

24 Q. But that you are the person with the

25 most knowledge about the preparation of the

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1 trademark application and the use of the mark

2 by PCNI, Inc. and the subjects who were listed

3 in the deposition; is that correct?

4 A. Correct.

5 Q. Okay. Thank you.

6 When we took a break, I was asking you

7 some questions about the formation and initial

8 activities of PCNI, Inc., the New Jersey

9 entity.

10 Am I correct, that from the very

11 beginning you were designated by leadership in

12 Nigeria to be the agent representing that

13 company; correct?

14 A. Yes.

15 Q. Okay. Were you ever referred to as

16 temporary agent?

17 Have you ever seen that?

18 A. No.

19 Q. Did anyone within the leadership of

20 PCNI Nigeria, ever tell you that you were being

21 replaced by anyone as the agent for People's

22 Club of Nigeria International, Inc.?

23 A. No.

24 Q. Did you ever learn from anyone -- not

25 just the leadership -- did anyone ever tell

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1 you, you're no longer authorized as an agent of

2 the People's Club of Nigeria International,

3 Inc. New Jersey?

4 A. No.

5 Q. So as far as you're concerned, your

6 understanding is that you have been the -- the

7 registered agent for that company since the day

8 it was formed in 2010?

9 A. Yes.

10 Q. After you formed the company, what, if

11 any, steps did you take to start to pursue a

12 trademark application with the U.S. Government?

13 What did you do? What did you do?

14 A. The lawyer, Sebastian Ibezim, initiated

15 the first application with some -- a group

16 called Clover. I don't remember the exact

17 name.

18 THE COURT REPORTER: Clover?

19 THE WITNESS: Klauber. K-L-A-U-B-E-R,

20 at trademark --

21 Q. K-L-A-U-B-E-R?

22 A. I think it's K-L-A-U-B-E-R.

23 Q. Klauber. Is that referring to a law

24 firm?

25 A. Yeah. I think it's a law firm that

<p style="text-align: right;">Page 50</p> <p>1 does trademark.</p> <p>2 Q. Would it be Klauber & Jackson?</p> <p>3 A. It's possible, yes.</p> <p>4 Q. K-L-A-U-B-E-R?</p> <p>5 A. Yes, that's B-E-R.</p> <p>6 Q. That sounds more familiar?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Okay. And that was -- was that</p> <p>9 a New Jersey law firm?</p> <p>10 A. No. I don't know where they are. The</p> <p>11 lawyer was the one that contacted them, and</p> <p>12 they made an initial search, and I was asked to</p> <p>13 pay money, so that they can initiate the</p> <p>14 application, and they were given money. They</p> <p>15 were paid a thousand -- a thousand something.</p> <p>16 I don't know the exact amount through the</p> <p>17 lawyer. That was it. We didn't hear from</p> <p>18 there until I got to the trademark attorney in</p> <p>19 2013.</p> <p>20 Q. And to whom are you referring when you</p> <p>21 say the "trademark attorney"?</p> <p>22 Are you referring to Mr. Swyers?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And that was in 2013?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. Did it come in a booklet form?</p> <p>2 A. No.</p> <p>3 Q. How did you see it?</p> <p>4 A. I got an email that I got from the</p> <p>5 lawyer. The lawyer emailed -- directed an</p> <p>6 email to me.</p> <p>7 Q. I see. Is that -- that's your</p> <p>8 recollection?</p> <p>9 A. Yes.</p> <p>10 Q. Was it a long email, or was it -- what</p> <p>11 do you remember about that email?</p> <p>12 A. That email, I don't remember much.</p> <p>13 They -- the bottom line is, other than People's</p> <p>14 Club of Nigeria International, I mean, Club of</p> <p>15 Nigeria International, there's no other user of</p> <p>16 that trademark, and the application could go</p> <p>17 through.</p> <p>18 Q. Okay. But up to that point in time,</p> <p>19 all the branches have been using it; correct?</p> <p>20 A. Oh, no. That's not what I discussed.</p> <p>21 I was talking about registration, not legally</p> <p>22 using the name. I'm talking about a</p> <p>23 registration trademark.</p> <p>24 Q. I see. I see. So is it your</p> <p>25 understanding that the search was confined just</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. So, let's stick for a moment with that</p> <p>2 first application process. You just told me</p> <p>3 that your attorney contacted Klauber & Jackson.</p> <p>4 They were retained to pursue a search.</p> <p>5 You described a search?</p> <p>6 A. Yes.</p> <p>7 Q. What do you mean by "search"?</p> <p>8 A. What do I mean by "search"?</p> <p>9 I think before they filed the</p> <p>10 application, they have to do a U.S. search.</p> <p>11 Q. What is your understanding of what the</p> <p>12 purpose of the search was?</p> <p>13 A. To find out if the trademark is being</p> <p>14 used by anybody -- legally.</p> <p>15 Q. Okay. Okay.</p> <p>16 A. And if the trademark is not being used</p> <p>17 by anybody legally, then you can file an</p> <p>18 application. That's -- that's my</p> <p>19 understanding.</p> <p>20 Q. Okay. Do you recall writing a check</p> <p>21 out of your -- out of that bank account in New</p> <p>22 Jersey to pay for that search?</p> <p>23 A. Yes.</p> <p>24 Q. Did you see the results of that search?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 53</p> <p>1 to people or entities that had an actual</p> <p>2 registration of the trademark?</p> <p>3 A. I don't know what they do search. I</p> <p>4 have no knowledge of what a search means. Just</p> <p>5 pay for it, and they give you the results.</p> <p>6 Q. Okay. Well, I can tell you that there</p> <p>7 are different ways of doing searches and lots</p> <p>8 of different results, and that's the reason I</p> <p>9 was asking. Did you get anything other than a</p> <p>10 simple email as the result of the search?</p> <p>11 Did you get anything like a thick</p> <p>12 booklet that had a lot of things in it?</p> <p>13 A. I'm not -- all I know, I was asked to</p> <p>14 pay money for a search. The search was done,</p> <p>15 and I was told we can go ahead with the</p> <p>16 application.</p> <p>17 Q. Okay.</p> <p>18 A. That's all I can confirm.</p> <p>19 Q. Did you then authorize -- once you got</p> <p>20 that email, did you then authorize an attorney</p> <p>21 to go ahead and make the filing?</p> <p>22 A. I authorized the attorney to go ahead</p> <p>23 and make the application.</p> <p>24 Q. And was it your understanding that</p> <p>25 Klauber & Jackson was doing it?</p>

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1 A. That's what I thought, and then nothing
 2 happened for years.
 3 Q. Do you know why?
 4 A. I don't know why.
 5 Q. Did you inquire?
 6 A. I don't know why. By the time we
 7 decided to pursue it actively, the lawyer --
 8 THE COURT REPORTER: Decided to pursue
 9 what?
 10 A. To pursue the application. The lawyer
 11 wasn't here. The lawyer had gone to Nigeria,
 12 so I had to get another lawyer.
 13 BY MR. HILLIARD:
 14 Q. I see. So as you sit here today, you
 15 don't have any recollection as to why the
 16 attorneys did not make any progress in filing
 17 the application?
 18 A. Correct.
 19 Q. Did -- were you receiving any requests
 20 for updates from the leadership in Nigeria
 21 about where the trademark registration
 22 application stood over the course of years when
 23 nothing was happening?
 24 A. What year?
 25 Q. Well, you told me that you had -- you

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1 thought Klauber & Jackson were pursuing the
 2 application and then nothing happened for
 3 years.
 4 A. Yes.
 5 Q. During that period of time, were you
 6 being questioned?
 7 Where does it stand?
 8 A. The only time it was questioned was in
 9 2013.
 10 Q. How was it questioned? How was it
 11 raised?
 12 A. The meeting of the leadership core
 13 group.
 14 Q. Leadership core?
 15 A. A leadership core group is a -- is a
 16 group of chairmen of our branches. They meet,
 17 and they were talking about the affairs of the
 18 club, and they asked what happened to the
 19 trademark application.
 20 And that's when I went back and tried
 21 to get to Klauber, and found out that the
 22 application was inactive, and I had to get
 23 another lawyer.
 24 Q. When you say "inactive," what do you
 25 mean?

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1 A. Nothing was happening.
 2 Q. Do you know whether or not anything had
 3 actually been filed with the government?
 4 A. I don't know.
 5 Q. You just learned that it had been
 6 inactive?
 7 A. I just learned they archived the
 8 application.
 9 Q. All right. And the first time this was
 10 coming up in your mind at least over the last
 11 couple of years, leading up to this leadership
 12 core group, is when it came up in that meeting?
 13 A. Yes.
 14 Q. Where was this meeting held in?
 15 A. Teleconference.
 16 Q. It was a teleconference.
 17 And who made up -- at the time of that
 18 teleconference, who made up the leadership core
 19 group?
 20 A. The chairman of the branches.
 21 Q. The chairman of each of the branches?
 22 A. The chairman and secretary of the
 23 branches.
 24 Q. Of that group?
 25 A. Of People's Club of Nigeria branches in

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1 the United States.
 2 Q. I see. So did the leadership core
 3 group include every single -- at that time --
 4 recognized branch of the United States?
 5 A. Recognize branch secretary, branch
 6 chairman and branch secretary.
 7 Q. So sounds like there were at least a
 8 couple of dozen people on this teleconference;
 9 right?
 10 A. Yeah, including there were about 20.
 11 Q. Okay.
 12 A. Twenty-one branches. Sorry. Talking
 13 about 42 people.
 14 Q. Do you recall who raised the question
 15 about the status of the trademark application?
 16 A. I don't recall.
 17 Q. Was the decision made during this
 18 teleconference about how to handle this
 19 trademark application at that time on what to
 20 do?
 21 A. Yes.
 22 Q. What was the decision?
 23 A. The decision then was to reapply. The
 24 instruction was that I reapply, because I was
 25 the one that did it the first time.

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1 Q. So it fell in your lap again?

2 A. Yes.

3 Q. And this teleconference occurred

4 sometime in 2013?

5 A. Yes.

6 Q. So what did you do?

7 After the teleconference was over, what

8 steps did you take?

9 A. I contacted a trademark attorney, and

10 they initiated the application.

11 Q. And that's Mr. Swyers and his

12 organization?

13 A. Yes.

14 Q. How did you find Mr. Swyers?

15 And as I ask a couple of questions

16 about Mr. Swyers, I want to press upon you not

17 to talk about your communications with him,

18 because that's covered by something called

19 attorney/client privilege.

20 I simply want to know, you know, basic

21 facts about, how did you come to find him, and

22 when did you retain him? So how did you find

23 Mr. Swyers?

24 A. I Googled Internet.

25 Q. Okay. Found him listed?

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1 A. Found him listed.

2 Q. Contacted him and then engaged him?

3 A. Contacted the office, talked to them,

4 and was impressed, if I remember, and decided

5 to go through the application with the company.

6 Q. Okay. Was this done through a written

7 engagement letter between you and his firm?

8 A. Telephone.

9 Q. Telephone? Nothing in writing? No

10 exchange?

11 A. Telephone.

12 Q. All telephone. Okay.

13 MR. SWYERS: And also I'm going to go

14 ahead and put an objection. I'm not quite

15 sure that this is reasonably calculated to

16 lead to the discovery of admissible evidence

17 in trial -- mainly our relationship with

18 this client.

19 MR. HILLIARD: I understand. I was

20 just looking to establish the chronology in

21 the timeline. That's all.

22 BY MR. HILLIARD:

23 Q. Do you recall when you retained

24 Mr. Swyers and his firm?

25 A. I don't know the exact date, no.

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1 Q. Was it in 2013?

2 A. I believe so.

3 Q. And did he thereafter prepare a

4 trademark application to submit to the U.S.

5 Patent and Trademark Office on behalf of the

6 company?

7 A. Yes.

8 Q. Okay. On behalf of what company? Who

9 were you --

10 A. People's Club of Nigeria International

11 subsidiary in New Jersey.

12 Q. New Jersey? Okay.

13 He was engaged -- so Mr. Swyers was

14 engaged to represent People's Club of Nigeria

15 International, Inc., the New Jersey company?

16 A. For the application.

17 Q. For the application.

18 Have you ever seen anything in writing

19 between People's Club of Nigeria International,

20 the Nigerian entity and the New Jersey

21 subsidiary PCNI, Inc.?

22 Have you ever seen anything in writing

23 between those two entities relating to

24 authorization to file the trademark

25 application?

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1 A. I don't understand the question.

2 Q. Sure. Did you ever see anything in

3 writing from anyone of People's Club of Nigeria

4 International that gave the New Jersey entity

5 authority to file the trademark application?

6 A. I thought I just explained to you the

7 process.

8 Q. You did. You did. I want to know if

9 there -- was there anything in writing? You

10 told me that there were discussions in an

11 executive committee meeting and --

12 A. There may be something in the minutes,

13 so I don't know. I can't answer.

14 Q. Okay. Okay. You know as you sit here

15 today, you don't recall anything?

16 A. I, meaning, if you're talking about a

17 separate -- a separate letter, then I don't

18 recall anything.

19 Q. A letter --

20 A. But there are minutes to that

21 discussion.

22 Q. Nothing in writing that you can recall

23 right now as you sit here?

24 A. I don't understand what you're

25 referring to.

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1 Q. Okay. Just to be clear, I simply
2 wanted to know if you have a recollection,
3 sitting here, of any documents exchanged that
4 the Nigerian entity said to the subsidiary, you
5 have the right to file the trademark
6 application on our behalf. You have the right
7 to pursue this in the United States.
8 A. I just said to you that I was told to
9 do that.
10 Q. Told to do that, right, I meant in
11 writing.
12 A. And why would I go back and put
13 something in writing, it's in the minutes.
14 Q. I'm not questioning whether --
15 A. If you recall asking what I recall, I
16 don't recall anything.
17 Q. I wasn't questioning what you did and
18 why you did it. I was just simply asking if
19 you know whether there was anything in writing.
20 Okay?
21 Did you review the trademark
22 application itself -- the document itself --
23 before it was filed -- the one that Mr. Swyers
24 just prepared?
25 A. Yes.

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1 Q. You did? You looked at it?
2 A. Yes.
3 Q. Did you approve it?
4 A. Yes.
5 Q. Did you make any changes to it?
6 A. The initial application?
7 Q. Yes.
8 A. No. The application was filed in, I
9 believe it was in November 2013, yes. And --
10 Q. Okay.
11 MR. HILLIARD: I just have a few
12 documents, Matt. You're there, right?
13 MR. SWYERS: Hi, I'm here.
14 MR. HILLIARD: Yeah. Okay.
15 MR. SWYERS: Right.
16 MR. HILLIARD: I'm going to mark and
17 show him the original application.
18 MR. SWYERS: Thank you. I got it.
19 MR. HILLIARD: The reporter has to mark
20 this first. I'm sorry. It will be P-1.
21
22 (Plaintiff's Exhibit Number 1,
23 Trademark Application, was marked for
24 identification.)
25

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1 MR. HILLIARD: As I printed out off
2 TEAS, it's nine pages.
3 MR. SWYERS: Okay.
4 MR. HILLIARD: It ends with the
5 declaration and then the specimen. And then
6 the letterhead. The letterhead is the last
7 page.
8 BY MR. HILLIARD:
9 Q. Dr. Mgbako, I place in front of you
10 what's been marked as P-1 for identification.
11 If you can take a moment to look at that, and
12 then I will ask you just a few questions about
13 it.
14 MR. SWYERS: And while he's looking at
15 that.
16 What letterhead are you speaking of?
17 MR. HILLIARD: This is the application
18 that was filed on November 12, 2013.
19 MR. SWYERS: Yes.
20 MR. HILLIARD: And the last two pages
21 consist of a specimen, which is just the
22 name PCNI in block lettering and then the
23 three-ring logo. And then right behind that
24 is a letterhead that has handwritten scroll
25 on it.

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1 MR. SWYERS: Now, I understand, that's
2 the specimen. Okay. Gotcha.
3 MR. HILLIARD: Right. I think that --
4 well, I guess both pages might be the
5 specimen. You might have submitted it as a
6 specimen. That's correct.
7 MR. SWYERS: Okay, thank you.
8 MR. HILLIARD: All right.
9 BY MR. HILLIARD:
10 Q. Do you recognize P-1, Doctor?
11 A. Yes, I do.
12 Q. Is this a -- a copy of the trademark
13 registration application filed with the U.S.
14 Patent and Trademark Office?
15 A. Yes.
16 Q. You reviewed this before it was filed;
17 correct?
18 A. Yes.
19 Q. Okay. And did you believe everything
20 in it to be true and accurate?
21 A. Yes.
22 Q. And did you understand at the time that
23 you approved it, that you were expected to make
24 sure that what you were submitting to the U.S.
25 Patent Trademark Office was truthful and

<p style="text-align: right;">Page 66</p> <p>1 accurate?</p> <p>2 A. Yes.</p> <p>3</p> <p>4 (Pause.)</p> <p>5</p> <p>6 MR. HILLIARD: Are you there?</p> <p>7 MR. SWYERS: Yes. Sorry about that. I</p> <p>8 got dropped right when you were saying is</p> <p>9 this the trademark application, and then it</p> <p>10 was busy for about a minute.</p> <p>11 MR. HILLIARD: Oh, okay. Yeah, I asked</p> <p>12 is this a copy of the trademark application.</p> <p>13 He said yes and then -- I can have you read</p> <p>14 it back. You --</p> <p>15 THE COURT REPORTER: Do you want the</p> <p>16 last question?</p> <p>17 MR. HILLIARD: Can you hear?</p> <p>18 MR. SWYERS: Yeah. I can finally --</p> <p>19 MR. HILLIARD: Probably right after</p> <p>20 that. I think I basically asked him: Is</p> <p>21 everything in here truthful and accurate?</p> <p>22 Did you understand at the time of the filing</p> <p>23 that you were expected to --</p> <p>24 THE COURT REPORTER: Right. That was</p> <p>25 your last question.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. That's the way it was. Now, it's</p> <p>2 People's Club of Nigeria International. It</p> <p>3 started off as People's Club of Nigeria and</p> <p>4 became "international" and the "international"</p> <p>5 word was added.</p> <p>6 Q. I see. So originally it was PCN for</p> <p>7 short?</p> <p>8 A. People's Club of Nigeria.</p> <p>9 Q. When it was formed in 1971?</p> <p>10 A. It wasn't international.</p> <p>11 Q. When did it become PCNI?</p> <p>12 When was the "international" added?</p> <p>13 A. When it become international, and you</p> <p>14 are looking at late '80s -- 1988, '90.</p> <p>15 Q. Okay.</p> <p>16 A. That's when the word "international"</p> <p>17 was added. I can't give you the exact date.</p> <p>18 Q. I see.</p> <p>19 A. That's my understanding.</p> <p>20 Q. Now, at the time you -- you authorized</p> <p>21 this application to be filed with the U.S.</p> <p>22 Patent and Trademark Office, if you see, sir,</p> <p>23 the date of the actual filing is on the front</p> <p>24 cover page, which is November 12th in 2013.</p> <p>25 That's when it was actually filed?</p>
<p style="text-align: right;">Page 67</p> <p>1 MR. HILLIARD: That you -- you know,</p> <p>2 you were expected to submit only something</p> <p>3 that was truthful and accurate to the U.S.</p> <p>4 PTO, and he said yes. I think that was it.</p> <p>5 MR. SWYERS: I'm not that concerned</p> <p>6 about this section. Thank you.</p> <p>7 MR. HILLIARD: No problem. No problem.</p> <p>8 MR. SWYERS: Thank you.</p> <p>9 BY MR. HILLIARD:</p> <p>10 Q. Can I direct your attention to the</p> <p>11 second-to-the-last page of the document?</p> <p>12 That appears to be just the name,</p> <p>13 People's Club of Nigeria International at the</p> <p>14 top; and it's not in color; it's in black and</p> <p>15 white. But it's a -- it's the three-ring logo</p> <p>16 design that we were referring to; correct?</p> <p>17 A. Yes.</p> <p>18 Q. Is that the trademark for which you</p> <p>19 were seeking registration from the U.S. PTO?</p> <p>20 A. Yes, that's the trademark, yes.</p> <p>21 Q. And the -- I'll call it the parent</p> <p>22 organization in Nigeria; is that known as PCNI?</p> <p>23 A. It was known as Nigeria International.</p> <p>24 Q. It is? It's not known simply as</p> <p>25 People's Club of Nigeria, in Nigeria?</p>	<p style="text-align: right;">Page 69</p> <p>1 A. Yes.</p> <p>2 Q. As of that date, did you believe that</p> <p>3 all of the existing branches in the United</p> <p>4 States had the authority to use the trademark</p> <p>5 which we just looked at, second-to-last page?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Including the Princeton Junction</p> <p>8 branch?</p> <p>9 A. Yes.</p> <p>10 Q. Chicago branch?</p> <p>11 A. Yes.</p> <p>12 Q. Miami branch?</p> <p>13 A. Yes.</p> <p>14 Q. Everyone else?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. And -- strike that.</p> <p>17 Now, can I ask you to look at the next</p> <p>18 page. This appears to be a letterhead;</p> <p>19 correct?</p> <p>20 A. Yes.</p> <p>21 Q. Did you create this letterhead?</p> <p>22 A. Yes.</p> <p>23 Q. Did you create it in connection with</p> <p>24 forming the subsidiary in New Jersey in 2010?</p> <p>25 A. Yes.</p>

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1 Q. Did you first create this letterhead --
2 strike that.
3 So you first started using this form of
4 letterhead. I don't mean the handwriting in
5 the middle of the document. This form of
6 letterhead, you first started using it in 2010?
7 A. When it was created, yes.
8 Q. And the United States address for
9 People's Club of Nigeria International is
10 listed as your home; correct?
11 A. 16 Wright Street, yes.
12 Q. How did you create this list of USA
13 branches that are listed down the left-hand
14 side of this document?
15 A. How did I create it? I don't
16 understand.
17 Q. How did you put that together? You
18 created the letterhead, so where did you get
19 this information from?
20 A. These are the legitimate branches.
21 Q. And you just knew that?
22 A. Yes.
23 Q. Okay. Were there any branches here
24 that were left off of the list?
25 A. No. All these branches here are

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1 legitimate branches at the time, yes.
2 Q. Is that your handwriting in the middle
3 of the document?
4 A. That's me, yes.
5 Q. What does it say?
6 A. Info at the Trademark Company --
7 THE COURT REPORTER: Wait, wait. Say
8 that again?
9 THE WITNESS: Info.
10 MR. HILLIARD: Info. I-N-F-O.
11 THE COURT REPORTER: Okay. Info.
12 THE WITNESS: Info@thetrademarkcompany.
13 com.
14 BY MR. HILLIARD:
15 Q. And then it says, attention new mark
16 design.
17 A. Yes.
18 Q. Why did you write that on the sheet?
19 Is this something that you were
20 providing to your lawyers?
21 A. That's -- why did I write it?
22 Q. Right.
23 A. I don't know why I wrote it. I can't
24 -- I don't recall why I wrote it, but I know I
25 sent some information to them. I don't know.

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1 Maybe I wrote it, that's what I told you.
2 Q. Now, in P-1, am I correct that you
3 believed at the time that this was filed that
4 you were filing this application on behalf of
5 the U.S. subsidiary --
6 A. Yes.
7 Q. -- PCNI, Inc., the New Jersey company?
8 A. I was filing the application on behalf
9 of People's Club of Nigeria International.
10 Q. Which -- which entity, though, when you
11 say People's Club of Nigeria International?
12 A. The club itself. The club. We have
13 one club. We don't have many. We have only
14 one club and branches. The club is People's
15 Club of Nigeria International. That's the only
16 club. There are no other clubs. We have
17 branches of the same club.
18 Q. Okay.
19 A. That's all, and you have a subsidiary
20 of that club.
21 Q. I see.
22 A. We don't have two clubs, we have one
23 club.
24 Q. One club which included all of the
25 branches?

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1 A. Which included all the branches and its
2 subsidiaries.
3 Q. Yes.
4 A. So I was doing it for the club, not for
5 this branch or for the subsidiary. I was doing
6 it for the People's Club.
7 Q. I see. Okay. So you believed at the
8 time that this was filed that you were filing
9 this on behalf of the Princeton Junction
10 branch?
11 A. On behalf of everybody.
12 Q. Including the Princeton Junction
13 branch?
14 A. All the branches listed here, including
15 the Princeton Junction, yes.
16 MR. HILLIARD: I'm going to mark this
17 as P-2.
18
19 (Plaintiff's Exhibit Number 2,
20 Response, was marked for identification.)
21
22 MR. HILLIARD: Matt?
23 MR. SWYERS: Yeah.
24 MR. HILLIARD: You there? Okay.
25 I'm now showing him the "Response to

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1 the Office Action."
 2 MR. SWYERS: All right.
 3 MR. HILLIARD: Which is one, two,
 4 three, four, five -- six pages.
 5 MR. SWYERS: I assumed it was dated
 6 January/February 27th, 2014. There's one
 7 for April 9th -- well, April 9th -- February
 8 27th. I apologize. The Office Action is
 9 February 27th.
 10 MR. HILLIARD: Right.
 11 MR. SWYERS: P-2 is just April 9th.
 12 MR. HILLIARD: Yeah, P-2 is April 9th.
 13 MR. SWYERS: All right. Fantastic.
 14 Thank you.
 15 BY MR. HILLIARD:
 16 Q. Let me know when you've had a chance to
 17 go through it.
 18 Have you had a chance to look through
 19 P-2?
 20 A. Yes.
 21 Q. Do you recognize it?
 22 A. I believe so, yes.
 23 Q. Okay. What do you understand this to
 24 be?
 25 A. I don't understand the question.

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1 Q. What do you understand this document to
 2 be? You said you recognized it.
 3 A. That's part of the application of the
 4 trademark.
 5 Q. Okay. Did you review this document
 6 before it was filed with the U.S. PTO?
 7 A. I believe I did, yes.
 8 Q. Can I ask you to look at the last page.
 9 This appears to be a form of a
 10 letterhead; correct?
 11 A. Yes.
 12 Q. Okay. Am I correct that this is
 13 different from the letterhead that we just
 14 looked at that was attached to P-1?
 15 A. Yes.
 16 Q. When did you create this -- strike
 17 that.
 18 Did you create this letterhead?
 19 A. Yes.
 20 Q. You personally?
 21 A. Yes.
 22 Q. When did you create this letterhead?
 23 A. In early 1994 -- 19 -- 2014. Sorry.
 24 Q. Early in 2014?
 25 A. Yes.

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1 Q. So after you filed the original
 2 application --
 3 A. That --
 4 Q. -- marked P-1?
 5 A. That's correct.
 6 Q. Which was filed in November?
 7 A. Yes.
 8 Q. After you did that, you created this
 9 new letterhead?
 10 A. We had to change the letterhead, yes.
 11 Q. Why did you have to change the
 12 letterhead?
 13 A. To reflect the status of the branches
 14 at that time.
 15 Q. Had it changed?
 16 A. Yes.
 17 Q. How did it change?
 18 A. Three branches were dissolved.
 19 Q. Which branches?
 20 A. Princeton Junction, Miami, and Chicago.
 21 Q. Did you personally participate in any
 22 way in the actions taken to, quote, unquote,
 23 dissolve those branches as you just testified?
 24 A. Yes.
 25 Q. What did you do? What was your role?

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1 A. I was -- two patrons of the club, we
 2 were appointed.
 3 Q. "Two" meaning you and someone else?
 4 A. Yep.
 5 Q. Who was the other person?
 6 A. Professor Aluka.
 7 THE COURT REPORTER: What name?
 8 THE WITNESS: Professor Aluka,
 9 A-L-U-K-A.
 10 BY MR. HILLIARD:
 11 Q. You and Professor Aluka --
 12 A. Yes.
 13 Q. -- as patrons were appointed --
 14 A. Yes.
 15 Q. -- to do what?
 16 A. I'll explain it to you.
 17 Q. Sure. Thank you.
 18 A. There was a CEC meeting in Dallas in
 19 2013, July. At that time the club was in
 20 crisis. People's Club of Nigeria was in crisis
 21 as a result of lawsuits filed by some U.S.
 22 members in Nigerian courts.
 23 Q. Who were these U.S. members that filed
 24 the lawsuits in Nigerian courts?
 25 A. Professor Ndubizu is one of them.

<p style="text-align: right;">Page 78</p> <p>1 THE COURT REPORTER: Professor --</p> <p>2 THE WITNESS: Professor Ndubizu is one</p> <p>3 of them.</p> <p>4 BY MR. HILLIARD:</p> <p>5 Q. The gentleman sitting to my left?</p> <p>6 A. The gentlemen sitting -- right -- one</p> <p>7 of them.</p> <p>8 Q. Okay.</p> <p>9 A. I can't give you all the details of all</p> <p>10 of the individuals, but he's one of the three</p> <p>11 patrons.</p> <p>12 Q. And he was the leader in the Princeton</p> <p>13 Junction branch; correct?</p> <p>14 A. He was a patron. He was a patron, yes.</p> <p>15 Not just Princeton, but patron of the club.</p> <p>16 Q. Understood.</p> <p>17 A. The lawyer is one of them. He's Dr.</p> <p>18 Aloyeze. He was also a patron there. Aloyeze.</p> <p>19 A-L-O-Y-E-Z-E.</p> <p>20 THE COURT REPORTER: -- E-Z-E. You</p> <p>21 said he was a doctor and a lawyer?</p> <p>22 THE WITNESS: He's a doctor, not a</p> <p>23 lawyer. Aloyeze. And he was another patron.</p> <p>24 BY MR. HILLIARD:</p> <p>25 Q. Who was the third?</p>	<p style="text-align: right;">Page 80</p> <p>1 A. There was a legal action in Nigeria.</p> <p>2 Q. And it caused a great deal of</p> <p>3 consternation and commotion within the club?</p> <p>4 A. It caused a great deal of</p> <p>5 consternation.</p> <p>6 At that July meeting, if I remember --</p> <p>7 at that July meeting, the decision was made by</p> <p>8 the Central Executive Committee, people who</p> <p>9 were there, that all branches, all branches</p> <p>10 were to write a letter, okay, regarding the</p> <p>11 action against the club. Okay?</p> <p>12 The outcome of that is that five</p> <p>13 branches in the United States sent a letter</p> <p>14 that it did not meet the guidelines, so -- meet</p> <p>15 the expectation of the club. So the club</p> <p>16 decided to dissolve the activities of the</p> <p>17 branches.</p> <p>18 Q. Based on what that letter said?</p> <p>19 A. Based -- I can't go into the details.</p> <p>20 Q. You can't?</p> <p>21 A. I cannot because I'm -- I'm not privy</p> <p>22 to the details --</p> <p>23 Q. I see.</p> <p>24 A. -- of the decision to dissolve.</p> <p>25 Q. You're not?</p>
<p style="text-align: right;">Page 79</p> <p>1 DR. NDUBIZU: Doctor --</p> <p>2 MR. HILLIARD: You can't talk. I'm</p> <p>3 sorry. Sorry about that. I didn't mean to</p> <p>4 scold you, but you're not --</p> <p>5 A. I know Dr. -- he's a physician -- Dr.</p> <p>6 Fabian. I can't recall his last name.</p> <p>7 THE COURT REPORTER: Dr. Fabian?</p> <p>8 THE WITNESS: I can't recall the last</p> <p>9 name.</p> <p>10 THE COURT REPORTER: Okay.</p> <p>11 BY MR. HILLIARD:</p> <p>12 Q. Now, was he -- these last two gentlemen</p> <p>13 you named, were they associated -- when I say</p> <p>14 associated, were they associated with --</p> <p>15 involved with a particular branch?</p> <p>16 A. Yes.</p> <p>17 Q. Miami and Chicago; would that be right?</p> <p>18 A. Not Chicago.</p> <p>19 Q. Okay.</p> <p>20 A. You have Washington, D.C., Houston,</p> <p>21 Chicago -- I can't give you the full details of</p> <p>22 who filed the lawsuit, but these are the</p> <p>23 patrons I know that filed. They're part of the</p> <p>24 group.</p> <p>25 Q. It was a legal action that was --</p>	<p style="text-align: right;">Page 81</p> <p>1 A. No, I'm not privy to it. Okay.</p> <p>2 But the outcome of it was that five</p> <p>3 branches had the executive committee dissolved,</p> <p>4 and they kept the committee appointed --</p> <p>5 recommended to be appointed a caretaker</p> <p>6 committee -- caretaker committee. The club</p> <p>7 decided to get away from the executive and</p> <p>8 appoint other leaders.</p> <p>9 Q. Other leaders for those branches?</p> <p>10 A. Yes, for those branches -- caretaker</p> <p>11 committee. Okay. All the branches wrote a</p> <p>12 letter and did whatever they were supposed to</p> <p>13 do. These five branches did not.</p> <p>14 Q. Who were the five branches that didn't?</p> <p>15 I assume it was --</p> <p>16 A. Washington, D.C., Houston, Princeton</p> <p>17 Junction, Miami, and Chicago.</p> <p>18 The letters, whatever the chairman</p> <p>19 wrote, were not acceptable to the people that</p> <p>20 made the decision. So the executives of these</p> <p>21 branches were dissolved, and it was recommended</p> <p>22 that the members appoint a caretaker committee</p> <p>23 and take over the functions of those branches,</p> <p>24 and then have another election and replace</p> <p>25 them.</p>

<p style="text-align: right;">Page 82</p> <p>1 Q. So the branches -- am I correct, then, 2 in terms of your testimony on behalf of the 3 entity, is that the branches themselves were 4 not dissolved? The leadership was being 5 changed? 6 A. I am -- I'm not done yet. 7 Q. You're not done yet. I'm sorry I cut 8 you off. 9 A. I'm giving you the information. 10 Q. I apologize. I cut you off. Go on. 11 Go on. 12 A. So the -- the branches were supposed to 13 come up with the caretaker committees. Okay. 14 Houston did, came up with a caretaker 15 committee and replaced their chairman; 16 Washington, D.C. came up with a caretaker 17 committee and replaced their chairman. Okay? 18 Chicago did not come up with a 19 caretaker committee; Miami did not come up with 20 a caretaker committee; Princeton Junction did 21 not come up with a caretaker committee. 22 Professor Aluka and myself were asked 23 to work with these branches regarding the 24 assets of the club. Okay? And we could not 25 get through to -- to Princeton Junction to help</p>	<p style="text-align: right;">Page 84</p> <p>1 Q. Where was the meeting? 2 A. In Onitsha, Nigeria. 3 O-N-I-T-S-H-A. Onitsha, Nigeria. 4 Q. When was the meeting? 5 A. December 21st, 2013. 6 Q. Thirteen or 14? 7 A. Fourteen -- 13. Sorry. Sorry. Sorry. 8 Q. That's all right. I just want to make 9 sure. 10 A. No, no -- '13. 11 Q. December 31st of 2014 was the date -- 12 A. December -- 13 Q. I misspoke. 14 A. 21st. 15 Q. Late December? 16 A. Yeah. 17 Q. Yeah, late December of 2014. 18 A. That's where the decision was made to 19 dissolve those three branches, and the letter 20 to that effect was issued in January 2014 and 21 that prompted the removal. 22 Q. The witness is holding up the last page 23 of P-2 as he gives the testimony. 24 A. Yes. That led to the removal of the 25 three branches from the little branches.</p>
<p style="text-align: right;">Page 83</p> <p>1 them create a caretaker committee; we could not 2 do the same thing with Chicago; we could not do 3 the same thing with Miami; and Professor Aluka 4 submitted a letter to the AGM meeting in 5 Nigeria where all branches gathered. 6 THE COURT REPORTER: Where all 7 branches? 8 THE WITNESS: Branches. 9 MR. HILLIARD: Gathered. 10 THE COURT REPORTER: Gathered. Okay. 11 A. We have offices of the branches. 12 Patrons and everybody else. We recommended 13 that these three branches be dissolved, because 14 we could not organize caretaker committees in 15 each of those branches, and they did not have 16 much assets for the club to worry about. Okay? 17 And our recommendation was approved at our 18 annual general meeting, and those three 19 branches were dissolved: Princeton Junction 20 dissolved; Chicago branch dissolved. Okay. 21 And Miami branch dissolved. 22 Q. Was that -- was that action on 23 dissolution for the three branches all taken at 24 the same meeting? 25 A. Same meeting.</p>	<p style="text-align: right;">Page 85</p> <p>1 That's the only reason. 2 Q. On the letterhead that was submitted 3 with P-2? 4 A. Yes. Yes. 5 Q. This letter to which you referred to, 6 after the decision was made in Nigeria, this 7 was a letter that was sent to the branches? 8 A. Sent to everybody. 9 Q. Sent to everybody in the club? 10 A. Oh, right. The letter was generated. 11 I got a copy. 12 Q. Were any members of the three branches 13 who were being voted on for dissolution, were 14 any members there at Nigeria? 15 A. I have no knowledge of that. 16 Q. You weren't there? 17 A. I was not. 18 Q. You were simply advised of this by the 19 folks in Nigeria? 20 A. Yes. 21 Q. How were you advised? By letter? By 22 email? By a phone call? 23 A. By letter. I think I gave you a copy 24 of my letter. 25 Q. Advising of the decision in Nigeria?</p>

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1 A. Yes.

2 Q. And are you certain that that vote on

3 the dissolution occurred sometime in December

4 of 2013?

5 A. Absolutely certain.

6 Q. Okay. And it was after that that you

7 created the letterhead that's attached to P-2?

8 A. Yes.

9 MR. SWYERS: And I apologize. I'm

10 going to object. I think he testified

11 December 13th -- December 2013.

12 MR. HILLIARD: Well, he did originally,

13 and then I asked him if it was 2014.

14 THE WITNESS: No, no, 2013, because the

15 letter is January 2014.

16 MR. HILLIARD: All right. Okay. I

17 didn't mean to -- I wasn't trying to -- I

18 just wanted to know when.

19 A. December '14 was just last December.

20 I'm talking about December 2013 --

21 BY MR. HILLIARD:

22 Q. December 2013. Okay. That was when

23 the vote occurred and right after that, you

24 created that letterhead that's attached to P-2?

25 A. The letterhead was created in response

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1 to the inquiry from my lawyers regarding --

2 it's not stationary -- all the things that they

3 needed for the final submission on the

4 application.

5 Q. Okay. Did you advise the U.S. Patent

6 and Trademark Office that you were excluding

7 certain branches from your application?

8 A. Did I advise them?

9 Q. Yes.

10 A. I have no direct -- I have no direct

11 communication with them. I only -- I -- my

12 connection -- contact with them was through my

13 lawyer.

14 Q. Okay.

15 A. The letterhead is there. The

16 letterhead was here and specific. There were

17 members there given information, they should

18 have read it.

19 Q. Okay.

20 A. Am I required to -- I don't think I'm

21 required to call them and advise them of this.

22 Q. Do you know why you were submitting

23 this revised letterhead, this changed

24 letterhead to the U.S. Patent and Trademark

25 Office?

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1 Why were you doing that?

2 A. There were questions asked about the

3 rings and all this -- just not part of the

4 letterhead. The lawyer contacted me. They

5 needed more information with other things that

6 they wanted in addition; that's when this was

7 done. That's the response.

8 Q. At the time you changed the letterhead,

9 was there still legal proceedings going on in

10 Nigeria brought by some of the members -- the

11 lawsuits you referred to earlier, was that

12 still going on?

13 A. There were several lawsuits. I don't

14 know. I can't answer that. No.

15 Q. Were you involved in any way in the --

16 in the defense of those lawsuits?

17 A. No.

18 Q. Do you know if they're still going on

19 today?

20 A. Some lawsuits are going on; some are --

21 some are lost; some are still pending. I don't

22 know. I can't. I can't testify to that.

23 Q. Okay. At the time you made these

24 trademark files, P-1 and P-2, especially P-2

25 with the U.S. Patent and Trademark Office, did

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1 you believe that the Princeton Junction, Miami,

2 and Chicago branches were challenging this

3 decision to dissolve the branches?

4 Were they challenging it?

5 A. To dissolve the branches?

6 Q. Yes.

7 A. They were not objecting.

8 Q. They weren't? They weren't objecting

9 to it?

10 A. It has nothing to do with it. They

11 were not challenging the dissolution of the

12 branches.

13 Q. They were not?

14 A. No. I have no information about that,

15 no.

16 Q. So they just accepted it?

17 A. The branches are dissolved. They're

18 dissolved. If you want to go to Nigeria to

19 challenge it, not challenge it in court.

20 They -- the club owns the branches.

21 The club had the right to remove the branches.

22 Okay. If you -- if you quarrel with issues

23 with the removal, the due process is you go to

24 branches. You don't run to court. The

25 constitution allows it. You don't run to court

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1 and challenge it. You go to -- go through your
 2 due process. I think that's -- go to the
 3 Central Executive Meeting and challenge it.
 4 That's where you challenge it. You don't
 5 challenge it in court.
 6 I'm not aware that the branches
 7 challenged the removal. And the lower courts,
 8 I understand, in Nigeria have nothing to do
 9 with being removed. It has something to do
 10 with other things; nothing to do with the
 11 trademark or the branches being removed.
 12 Q. Okay. Other than the letter that you
 13 referred to earlier, you said the letter had
 14 been sent to everyone advising the members in
 15 the United States that that decision had been
 16 made in Nigeria to dissolve these three
 17 branches. Did you ever see anything else in
 18 writing relating to what happened in Nigeria on
 19 the dissolution vote?
 20 A. Yes.
 21 Q. What did you see?
 22 A. Minutes of the meeting.
 23 Q. Have you produced those in this action?
 24 A. I have them. I just got them. I had
 25 them. I haven't produced them.

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1 Q. You haven't? You have them --
 2 A. I have them in my possession.
 3 Q. You have them in your possession -- the
 4 minutes of that meeting?
 5 A. Yes.
 6 MR. HILLIARD: Matt, I'll make a
 7 request for a copy of those.
 8 MR. SWYERS: Absolutely.
 9 MR. HILLIARD: I'll follow up with a
 10 letter to you.
 11 MR. SWYERS: Thank you.
 12
 13 INFORMATION REQUESTED:
 14
 15 MR. HILLIARD: Give me a minute here.
 16 Matt, I'm just marking your production Bates
 17 stamped 002 to 003.
 18 MR. SWYERS: Thank you.
 19
 20 (Plaintiff's Exhibit Number 3, Two-page
 21 Document, was marked for identification.)
 22
 23 BY MR. HILLIARD:
 24 Q. Dr. Mgbako, you have in front of you
 25 what's been marked as P-3 for identification on

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1 the record. And I can tell you that these are
 2 two -- two documents that you produced to us.
 3 It has a marking on the bottom of it -- a
 4 number two and a number three which is a
 5 control number that shows what documents that
 6 you produced to us in response to our requests;
 7 so this came from your files is my
 8 understanding.
 9 Do you recognize them?
 10 A. Yes.
 11 Q. And they at least appear to me to be
 12 two pages that they don't belong together, in
 13 the sense that one's not a continuation of the
 14 other, but do you recognize the first page?
 15 A. Yes.
 16 Q. And what is it?
 17 A. It's a correspondence.
 18 Q. Is it the first page --
 19 A. That's the first page.
 20 Q. -- of the letter?
 21 A. Yes.
 22 Q. Okay. It was dated January 17, 2014?
 23 A. Yes.
 24 Q. Is this the letter to which you
 25 referred to a few minutes ago in your

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1 testimony?
 2 A. Yes.
 3 Q. About a communication that was sent
 4 advising of some dissolution vote on the
 5 branches that was taken in Nigeria?
 6 A. Yes.
 7 Q. Do you know who drafted this letter?
 8 Who wrote it?
 9 A. There's a signature on page two.
 10 Q. Chief Ilonze?
 11 A. Yes.
 12 Q. And Elder Ebere?
 13 A. Yes.
 14 Q. Okay. They wrote this document -- the
 15 first page; correct?
 16 A. That's their signature. They wrote it.
 17 Q. On the top? Okay.
 18 How did you receive this?
 19 A. This was sent to me by email.
 20 Q. From someone in Nigeria?
 21 A. Yes.
 22 Q. Okay. Did you -- were you asked to
 23 distribute it to anyone else?
 24 A. No.
 25 Q. So you got your copy by email?

<p style="text-align: right;">Page 94</p> <p>1 A. I got my copy, yes.</p> <p>2 Q. And am I correct that you can't testify</p> <p>3 whether anyone else got?</p> <p>4 A. I can't.</p> <p>5 Q. You don't know whether any of the other</p> <p>6 branches received this; is that correct?</p> <p>7 A. I don't know.</p> <p>8</p> <p>9 (Pause.)</p> <p>10</p> <p>11 MR. HILLIARD: I'll be right back.</p> <p>12 You're hearing silence only because I'm</p> <p>13 looking at a couple of documents here.</p> <p>14 MR. SWYERS: That's fine.</p> <p>15 MR. HILLIARD: Let's just take three</p> <p>16 minutes, and we'll leave the line open.</p> <p>17 I'll talk outside with my client for a</p> <p>18 moment.</p> <p>19</p> <p>20 (A short break was taken.)</p> <p>21</p> <p>22 MR. HILLIARD: I have no further</p> <p>23 questions. I'm done.</p> <p>24 MR. SWYERS: All right. I have a few.</p> <p>25 Are we all right?</p>	<p style="text-align: right;">Page 96</p> <p>1 A. Yes. Yes.</p> <p>2 Q. Okay. And to the best of your</p> <p>3 knowledge, you told the truth when providing</p> <p>4 the specimens to our office in that regard;</p> <p>5 correct?</p> <p>6 A. I told the truth, yes.</p> <p>7 Q. Okay. And there may be some confusion</p> <p>8 on the dates here today, but the specimen was</p> <p>9 in use as certified to the U.S. PTO, to the</p> <p>10 best of your knowledge; is that correct?</p> <p>11 A. Yes.</p> <p>12 MR. SWYERS: Okay. I actually have no</p> <p>13 further questions at this juncture.</p> <p>14 THE COURT REPORTER: We're done?</p> <p>15 MR. HILLIARD: We're done.</p> <p>16 THE COURT REPORTER: Okay. So, Mr. -- I</p> <p>17 mean, Matt, you want a copy? I don't know</p> <p>18 how it works.</p> <p>19 MR. SWYERS: We're going to actually</p> <p>20 talk to my client about it. Well, I don't</p> <p>21 mind talking about it. She's going to, you</p> <p>22 know -- we can get a copy of it. I actually</p> <p>23 would need to get a copy of it. It probably</p> <p>24 would cost you about four or five hundred</p> <p>25 dollars to do so, on average. You know, it</p>
<p style="text-align: right;">Page 95</p> <p>1</p> <p>2 CROSS-EXAMINATION</p> <p>3 BY MR. SWYERS:</p> <p>4 Q. Doctor, I want to refer you back to the</p> <p>5 trademark application. I think it's the second</p> <p>6 -- dated April 9, 2014.</p> <p>7 MR. HILLIARD: So that's P-2.</p> <p>8 BY MR. SWYERS:</p> <p>9 Q. Do you have that in front of you?</p> <p>10 MR. HILLIARD: P-2; correct?</p> <p>11 MR. SWYERS: I believe that's correct.</p> <p>12 MR. HILLIARD: I'll put it in front of</p> <p>13 him. He has it.</p> <p>14 MR. SWYERS: Thank you.</p> <p>15 BY MR. SWYERS:</p> <p>16 Q. Now, when we went back and forth there</p> <p>17 was some confusion about whether the</p> <p>18 dissolution meeting happened in 2013 or 2014;</p> <p>19 is that correct?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And you're aware that certain</p> <p>22 certifications were made when we file a</p> <p>23 specimen with the Patent and Trademark Office</p> <p>24 regarding it being used in commerce; is that</p> <p>25 correct?</p>	<p style="text-align: right;">Page 97</p> <p>1 could be a little more; it could be a little</p> <p>2 less. Even if it's not less, would you like</p> <p>3 us to order a copy? I do recommend it.</p> <p>4 THE WITNESS: I have no problems with</p> <p>5 it.</p> <p>6 MR. SWYERS: Yeah, we'll take a copy.</p> <p>7 MR. HILLIARD: Okay, Matt. We're going</p> <p>8 to disconnect.</p> <p>9 MR. SWYERS: Fair enough.</p> <p>10 MR. HILLIARD: Thanks.</p> <p>11 MR. SWYERS: Doctor, I'll call you in a</p> <p>12 few minutes.</p> <p>13 THE WITNESS: Okay. Thanks.</p> <p>14 MR. SWYERS: Thanks. Bye.</p> <p>15</p> <p>16 (Time noted: 12:55 p.m.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

1 CERTIFICATION

2
3 I, MARY T. SLAVIK, Court Reporter and
4 Notary Public, do hereby certify:

5 That I reported the proceedings that are
6 hereinbefore set forth, and that such transcript is a
7 true and accurate record of said proceedings.

8 AND, I further certify that I am not
9 related to any of the parties to this action by blood
10 or marriage, and that I am in no way interested in
11 the outcome of this matter.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand.

14
15
16 MARY T. SLAVIK, RPR
17 Court Reporter
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1 CERTIFICATION

2
3 I, Mary T. Slavik, RPR, Court Reporter and
4 Notary Public do hereby certify:

5 That I reported the proceedings that are
6 hereinbefore set forth, and that such transcript is a
7 true and accurate record of said proceedings.

8 AND, I further certify that I am not related
9 to any of the parties to this action by blood or
10 marriage, and that I am in no way interested in the
11 outcome of this matter.

12 IN WITNESS WHEREOF, I have hereunto set my
13 hand.

14
15
16 Mary T. Slavik, RPR
17 Court Reporter
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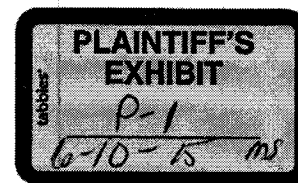
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TEAS Plus Application

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Filing Date: 11/12/2013

NOTE: Data fields with the * are mandatory under TEAS Plus. The wording "(if applicable)" appears where the field is only mandatory under the facts of the particular application.

The table below presents the data as entered.

Input Field	Entered
TEAS Plus	YES
MARK INFORMATION	
*MARK	<u>\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml1\FTK0002.JPG</u>
*SPECIAL FORM	YES
USPTO-GENERATED IMAGE	NO
LITERAL ELEMENT	PEOPLES CLUB OF NIGERIA INTERNATIONAL
*COLOR MARK	YES
*COLOR(S) CLAIMED (If applicable)	The color(s) black, blue, red, yellow is/are claimed as a feature of the mark.
*DESCRIPTION OF THE MARK (and Color Location, if applicable)	The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.
PIXEL COUNT ACCEPTABLE	YES
PIXEL COUNT	944 x 295
REGISTER	Principal
APPLICANT INFORMATION	
*OWNER OF MARK	Peoples Club of Nigeria International
*STREET	16 Wright St.

*CITY	Edison
*STATE (Required for U.S. applicants)	New Jersey
*COUNTRY	United States
*ZIP/POSTAL CODE (Required for U.S. applicants only)	08820
LEGAL ENTITY INFORMATION	
*TYPE	association
* STATE/COUNTRY WHERE LEGALLY ORGANIZED	Nigeria
GOODS AND/OR SERVICES AND BASIS INFORMATION	
*INTERNATIONAL CLASS	041
*IDENTIFICATION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
*FILING BASIS	SECTION 1(a)
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FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
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*CLAIMED PRIOR REGISTRATION (if applicable)	
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(if applicable)	
*CONCURRENT USE CLAIM (if applicable)	
DISCLAIMER	No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.
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SIGNATORY'S PHONE NUMBER	1-800-906-8626
* DATE SIGNED	11/12/2013

Trademark/Service Mark Application, Principal Register

TEAS Plus Application

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Filing Date: 11/12/2013

To the Commissioner for Trademarks:

MARK: PEOPLES CLUB OF NIGERIA INTERNATIONAL (stylized and/or with design, see mark)

The literal element of the mark consists of PEOPLES CLUB OF NIGERIA INTERNATIONAL. The color(s) black, blue, red, yellow is/are claimed as a feature of the mark. The mark consists of the black letters PEOPLES CLUB OF NIGERIA INTERNATIONAL above a blue circle bordered in black linked to a red circle bordered in black linked to a yellow circle bordered in black.

The applicant, Peoples Club of Nigeria International, a association legally organized under the laws of Nigeria, having an address of

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Edison, New Jersey 08820
United States

requests registration of the trademark/service mark identified above in the United States Patent and Trademark Office on the Principal Register established by the Act of July 5, 1946 (15 U.S.C. Section 1051 et seq.), as amended, for the following:

For specific filing basis information for each item, you must view the display within the Input Table.

International Class 041: Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

In International Class 041, the mark was first used by the applicant or the applicant's related company or licensee predecessor in interest at least as early as 00/00/1994, and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce. The applicant is submitting one(or more) specimen(s) showing the mark as used in commerce on or in connection with any item in the class of listed goods and/or services, consisting of a(n) letterhead.

Original PDF file:

SPE0-9767147154-131702076 . filename-1.pdf

Converted PDF file(s) (1 page)

Specimen File1

No claim is made to the exclusive right to use "Nigeria" apart from the mark as shown.

The applicant's current Attorney Information:

Matthew H. Swyers, Esq. of The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
United States

The applicant's current Correspondence Information:

Matthew H. Swyers, Esq.
The Trademark Company
344 Maple Ave. West, Suite 151
Vienna, Virginia 22180
1-800-906-8626(phone)
1-877-351-5480(fax)
info@thetrademarkcompany.com (authorized)

A fee payment in the amount of \$275 has been submitted with the application, representing payment for 1 class(es).

Declaration

The undersigned, being hereby warned that willful false statements and the like so made are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements, and the like, may jeopardize the validity of the application or any resulting registration, declares that he/she is properly authorized to execute this application on behalf of the applicant; he/she believes the applicant to be the owner of the trademark/service mark sought to be registered, or, if the application is being filed under 15 U.S.C. Section 1051(b), he/she believes applicant to be entitled to use such mark in commerce; to the best of his/her knowledge and belief no other person, firm, corporation, or association has the right to use the mark in commerce, either in the identical form thereof or in such near resemblance thereto as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion, or to cause mistake, or to deceive; and that all statements made of his/her own knowledge are true; and that all statements made on information and belief are believed to be true.

Signature: /Matthew H. Swyers/ Date Signed: 11/12/2013

Signatory's Name: Matthew H. Swyers

Signatory's Position: Attorney of Record

RAM Sale Number: 86116372

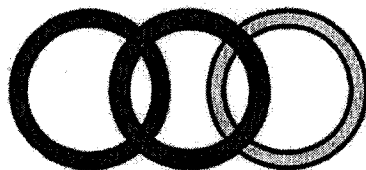
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Serial Number: 86116372

Internet Transmission Date: Tue Nov 12 13:30:59 EST 2013

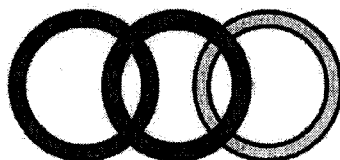
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PEOPLES CLUB OF NIGERIA INTERNATIONAL



PEOPLES CLUB OF NIGERIA INTERNATIONAL

REGISTERED IN NIGERIA
REGISTERED IN UNITED STATES
REGISTERED IN UNITED KINGDOM
REGISTERED IN CANADA



USA Address

16 Wright Street
Edison, NJ 08820

Chief F.A. Onwuachu
Chairman, Management Committee
Ichic P.D.C. Okechukwu
General Secretary, Management Committee

Headquarters

Onitsha/Owerrie Road
P.O. Box 5421
Onitsha, Anambra State
NIGERIA

USA Branches

Houston
Washington, DC
Miami
Princeton
Galveston
Dallas/Fort Worth
Boston
Philadelphia
Atlanta
New York
Cherry Hill
San Francisco
Princeton Junction
Chicago
Arlington
New Haven
Los Angeles
San Antonio
Virginia Beach
Austin Texas

Canada

Toronto Branch

United Kingdom

London Branch

*Info: The Trade mark Company.com
ATTN: NEW MARK DESIGN*

Governing Council: HRH Igwe P.C. Ezenwa, Chairman



Response to Office Action

The table below presents the data as entered.

Input Field	Entered
SERIAL NUMBER	86116372
LAW OFFICE ASSIGNED	LAW OFFICE 109
MARK SECTION (no change)	
LEGAL ENTITY SECTION (current)	
TYPE	association
STATE/COUNTRY WHERE LEGALLY ORGANIZED	NG
LEGAL ENTITY SECTION (proposed)	
TYPE	corporation
STATE/COUNTRY OF INCORPORATION	Nigeria
GOODS AND/OR SERVICES SECTION (current)	
INTERNATIONAL CLASS	041
DESCRIPTION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994
GOODS AND/OR SERVICES SECTION (proposed)	
INTERNATIONAL CLASS	041
DESCRIPTION	Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members
FILING BASIS	Section 1(a)
FIRST USE ANYWHERE DATE	At least as early as 00/00/1994
FIRST USE IN COMMERCE DATE	At least as early as 00/00/1994

STATEMENT TYPE	"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use" [for an application based on Section 1(b) Intent-to-Use].
SPECIMEN FILE NAME(S)	\\TICRS\EXPORT16\IMAGEOUT 16\861\163\86116372\xml6\ ROA0002.JPG
SPECIMEN DESCRIPTION	Flier advertising club
ADDITIONAL STATEMENTS SECTION	
DISCLAIMER	No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.
SIGNATURE SECTION	
DECLARATION SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
RESPONSE SIGNATURE	/Matthew H. Swyers/
SIGNATORY'S NAME	Matthew H. Swyers
SIGNATORY'S POSITION	Attorney of Record
SIGNATORY'S PHONE NUMBER	800-906-8626 x100
DATE SIGNED	04/09/2014
AUTHORIZED SIGNATORY	YES
FILING INFORMATION SECTION	
SUBMIT DATE	Wed Apr 09 15:13:46 EDT 2014
TEAS STAMP	USPTO/ROA-97.67.147.154-2 0140409151346993964-86116 372-50078b2aafcd15404828 5f90e0a9aa26be0ce2d749d8b 0212a8aab199f2264d8-N/A-N /A-20140409150801932050

Response to Office Action
To the Commissioner for Trademarks:

Application serial no. **86116372** has been amended as follows:

CLASSIFICATION AND LISTING OF GOODS/SERVICES

Applicant proposes to amend the following class of goods/services in the application:

Current: Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Original Filing Basis:

Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Proposed: Class 041 for Social club services, namely, arranging, organizing, and hosting social events, get-togethers, and parties for club members

Filing Basis: Section 1(a), Use in Commerce: The applicant is using the mark in commerce, or the applicant's related company or licensee is using the mark in commerce, on or in connection with the identified goods and/or services. 15 U.S.C. Section 1051(a), as amended. The mark was first used at least as early as 00/00/1994 and first used in commerce at least as early as 00/00/1994, and is now in use in such commerce.

Applicant hereby submits one(or more) specimen(s) for Class 041. The specimen(s) submitted consists of Flier advertising club.

"The substitute (or new, if appropriate) specimen(s) was/were in use in commerce at least as early as the filing date of the application" [for an application based on Section 1(a), Use in Commerce] OR "The substitute (or new, if appropriate) specimen(s) was/were in use in commerce prior either to the filing of the Amendment to Allege Use or expiration of the filing deadline for filing a Statement of Use"

[for an application based on Section 1(b) Intent-to-Use].

Specimen File1

APPLICANT AND/OR ENTITY INFORMATION

Applicant proposes to amend the following:

Current: Peoples Club of Nigeria International a(n) association, legally organized under the laws of NG, having an address of

16 Wright St.
Edison, New Jersey 08820
United States

Proposed: Peoples Club of Nigeria International, a corporation of Nigeria, having an address of
16 Wright St.

Edison, New Jersey 08820
United States

ADDITIONAL STATEMENTS

Disclaimer

No claim is made to the exclusive right to use CLUB OF NIGERIA INTERNATIONAL apart from the mark as shown.

SIGNATURE(S)

Declaration Signature

DECLARATION: The signatory being warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. Section 1001, and that such willful false statements and the like may jeopardize the validity of the application or submission or any registration resulting therefrom, declares that, if the applicant submitted the application or amendment to allege use (AAU) unsigned, all statements in the application or AAU and this submission based on the signatory's own knowledge are true, and all statements in the application or AAU and this submission made on information and belief are believed to be true.

STATEMENTS FOR UNSIGNED SECTION 1(a) APPLICATION/AAU: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(a) or AAU under 15 U.S.C. Section 1051(c), the signatory additionally believes that: the applicant is the owner of the trademark/service mark sought to be registered; the applicant or the applicant's related company or licensee is using the mark in commerce and has been using the mark in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU, and such use by the applicant's related company or licensee inures to the benefit of the applicant; the original specimen(s), if applicable, shows the mark in use in commerce as of the filing date of the application or AAU on or in connection with the goods/services in the application or AAU; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

STATEMENTS FOR UNSIGNED SECTION 1(b)/SECTION 44 APPLICATION: If the applicant filed an unsigned application under 15 U.S.C. Section 1051(b), Section 1126(d), and/or Section 1126(e), the signatory additionally believes that: the applicant is entitled to use the mark in commerce; the applicant has a bona fide intention and has had a bona fide intention as of the application filing date to use or use through the applicant's related company or licensee the mark in commerce on or in connection with the goods/services in the application; and to the best of the signatory's knowledge and belief, no other person has the right to use the mark in commerce, either in the identical form or in such near resemblance as to be likely, when used on or in connection with the goods/services of such other person, to cause confusion or mistake, or to deceive.

Signature: /Matthew H. Swyers/ Date: 04/09/2014

Signatory's Name: Matthew H. Swyers

Signatory's Position: Attorney of Record

Signatory's Phone Number: 800-906-8626 x100

Response Signature

Signature: /Matthew H. Swyers/ Date: 04/09/2014

Signatory's Name: Matthew H. Swyers
Signatory's Position: Attorney of Record

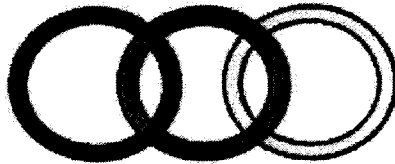
Signatory's Phone Number: 800-906-8626 x100

The signatory has confirmed that he/she is an attorney who is a member in good standing of the bar of the highest court of a U.S. state, which includes the District of Columbia, Puerto Rico, and other federal territories and possessions; and he/she is currently the applicant's attorney or an associate thereof; and to the best of his/her knowledge, if prior to his/her appointment another U.S. attorney or a Canadian attorney/agent not currently associated with his/her company/firm previously represented the applicant in this matter: (1) the applicant has filed or is concurrently filing a signed revocation of or substitute power of attorney with the USPTO; (2) the USPTO has granted the request of the prior representative to withdraw; (3) the applicant has filed a power of attorney appointing him/her in this matter; or (4) the applicant's appointed U.S. attorney or Canadian attorney/agent has filed a power of attorney appointing him/her as an associate attorney in this matter.

Serial Number: 86116372
Internet Transmission Date: Wed Apr 09 15:13:46 EDT 2014
TEAS Stamp: USPTO/ROA-97.67.147.154-2014040915134699
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N/A-N/A-20140409150801932050

PEOPLES CLUB OF NIGERIA INTERNATIONAL

USA Address
16 Wright Street
Edison, NJ 08820

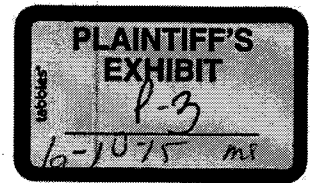


Headquarters
Onitsha/Owerrie Road
P.O. Box 5421
Onitsha, Anambra State
NIGERIA

USA Branches

Houston
Washington, DC
Princeton
Galveston
Dallas/ Fort Worth
Boston
Philadelphia
Atlanta
New York
Cherry Hill
San Francisco
Arlington
New Haven
Los Angeles
San Antonio
Virginia Beach
Austin Texas

Motto : Unity, Love, Service
A Social Club



consequences.

Chief (Sir) J.I. Ilonze
President P.C.N.I.

Hon. (Elder) Smart O. Ebere
General Secretary P.C.N.I

2 of 2

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.



MOTTO: UNITY, LOVE & SERVICE

NIGERIA/INTERNATIONAL HEADQUARTERS:

Onitsha/Owerri Road,
P.O. Box 5421
Onitsha, Anambra State,
Tel: 08037080187, 08066728872
E-mail: peopleclubofnigeria@yahoo.com
Website: www.peopleclubofnigeria.com

Our Ref: _____ Your Ref: _____ Date: _____

17th January, 2014

NATIONAL/INTERNATIONAL OFFICERS

President
Chief Sir J. I. Ilonze

1st Vice President
Chief Orykachi O. Oduro

2nd Vice President
Chief R. O. C. Ekechukwu

3rd Vice President
Chief Sam Ikwue

National Secretary
Elder Smart O. Ebere

1st Assistant National Sec.
Chief C. C. M. Okeke

2nd Assistant National Sec.
Lady Doris A. Nwa

Financial Secretary
Chief P. O. Okeke

Legal Adviser
Chief F. O. Okeke

Assistant Legal Adviser
Sen. Okeke

Publicity Secretary
Chief J. O. W. Okeke

Assistant Publicity Sec.
Prof. Emma Okeke

To: All Members of P.C.N.I
All Branch of P.C.N.I. World
Chicago Branch of P.C.N.I
Miami Branch of P.C.N.I
Princeton Junction Branch of P.C.N.I
San-Antonio Branch of P.C.N.I

Final Dissolution and withdrawal of charter of Chicago, Miami and Princeton Junction Branches of P.C.N.I

Further to the decision of Central Executive Committee (C.E.C.) on 20th July, 2013 at Dallas Forth-Worth and letters of 7th September, 2013; dissolving the executive committee of Chicago, Miami and Princeton Junction branches pending the review of their status and re-constitution of new executives, the Club at its Annual General Meeting (AGM) held at its International Headquarters, Onitsha on 20th December, 2013, unanimously resolved as follows:

- (i) To close down Chicago, Miami and Princeton Junction completely and withdraw and or cancel the Club's charter for

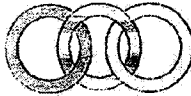
Dissolved

000002

PEOPLES CLUB OF NIGERIA/INTERNATIONAL

CACIT No. 1295
Registered in Nigeria.

BANKERS:
PNC Bank
Zenith Bank of Nigeria Plc.



MOOTO: UNITY, LOVE & SERVICE

US Serial No. 89116372
Registered in United States.
NIGERIA/INTERNATIONAL HEADQUARTERS:
Onitsha / Owerri Road,
P.O. Box 6421
Onitsha, Anambra State,
Tel: 08037889187, 08066728872.
E-mail: peoplesclubnigeria@yahoo.com
Website: www.peoplesclubnigeria.com

Our Ref:

Your Ref:

Date: 25/10/2014

PEOPLES CLUB OF NIGERIA/INTERNATIONAL
ONITSHA

President
CHIEF SIR J. I. ILONZE

1st Vice President
CHIEF ONYERACHA O. OKORO

2nd Vice President
CHIEF R. O. C. EKEODOZI

3rd Vice President
CHIEF SAM NWGWE

National Secretary
ELDER SMART O. EBERE

1st Assistant National Sec.
CHIEF G. C. MOKWU

2nd Assistant National Sec.
LADY DONIS ANYADOR

Financial Secretary
CHIEF PAULINUS ONYERUFORO

National Treasurer
CHIEF SIR DR. A. E. OKEKE

Legal Adviser
CHIEF F. O. ONYEBUEKE

Assistant Legal Adviser
ANTHONY OFILI EGBUSI (KSA)

2nd Assistant Legal Adviser
BAR. OKAY AJPOMI

Publicity Secretary
CAPT. J. O. N. OYEYEMI

Assistant P. M. Sec.
PROF. EMMA OYARA

Protocol Officer
CHIEF ALVAN OKOYE

Assistant Protocol Officer
HON. BON IBEKE

Welfare Officer
CHIEF GODDY ORAHEDO

Assistant Welfare Officer
LADY RUBY KRADE

2nd Assistant Welfare Officer
IZE BON KWUAGYU

3rd Assistant Welfare Officer
BRO. GODWIN ADENIJE

4th Assistant Welfare Officer
CHIEF S. O. KBOHAEZE

House Master
CHIEF MARTIN EZEKE

Assistant House Master
CHIEF ERNEST O. UGURU

2nd Assistant House Master
HON. VICTOR INEKE

3rd Assistant House Master
HON. ANJANE OKERE

To:

Patron Iddi Mgbako
No. 16 Wright
St Edison
NJ 08820

Sir

INFORMATION ABOUT PEOPLES CLUB OF NIGERIA

Peoples Club of Nigeria International is a social Club registered in Nigeria with branches in Nigeria, Canada, United Kingdom, and United States of America. Each branch is organized under a Charter granted by PCNI authorities in Nigeria. When a charter is withdrawn such a branch ceases to exist regardless of their registration status where they operate. The Club has the right to dissolve offending executives and appoint caretaker committees when appropriate.

The Peoples Club of Nigeria International New Jersey is a subsidiary of Peoples Club of Nigeria International registered in Nigeria. The Peoples Club of Nigeria International New Jersey operates under the constitution of Peoples Club of Nigeria registered in Nigeria. The branches of Peoples Club in the USA report directly to the authorities in Nigeria.

Patron Dr. Ambrose Mgbako is the current appointed agent of PCNI New Jersey and authorized to apply, obtain, monitor and prosecute any violation of Peoples Club of Nigeria International Trademark.

Chief (Dr) Sir J.I. Ilonze
President PCNI

Hon. Elder Smart O. Ebere
National Secretary PCNI

TRUSTEES: HRM Igwe P. C. Ezenwa, Chief J. O. Igwe, Chief E. N. Odilinye, Chief I. Ojukwu Ike,
HRM Igwe R. N. Nwankwo, Chief J. C. Okafor, Chief F. N. Okekeazu
Address all correspondence to the General Secretary
honsmariebere@gmail.com (08066728872)

INTERROGATORY NO. 6

E

X

H

I

B

I

T

S

Exhibit “S”

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History of Peoples Club of Nigeria International (PCNI)

The People's Club of Nigeria was founded by Nigerians who are impelled by the desire to foster good relations amongst mankind and to sponsor and promote charitable and philanthropic causes. Peoples Club was formed in 1971 in Abuja (then state of Nigeria) by a small group of individuals led by Chief Titus I. Ume-Ezokola. This was at a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. The Club was formed with the spirit of uniting people of like-minds, for social intervention. The formation was timely and extensively welcomed because of the Club's founding purpose which reads "be your brother's keeper" and was also embodied in its motto: Unity, love and Service. Since the formation, the Club has grown extensively. By the year 2000, there was a branch of Peoples Club in every major city in Nigeria. Peoples Club headquarters is located in Onitsha, Anambra State of Nigeria. Peoples Club is often imitated but seldom duplicated. Since 1971, there have been other clubs that tried to compete with Peoples Club, but could not compete. This is why Peoples Club is a privilege to belong. Membership is open to all irrespective of race, religion or tribe. The Club is non political.

The Motto of the Club is Reflected in PCNI Ring

NON-PLAN MEETS

[Odi.Net](#)
[Nigerian.News](#)
[Guardian.News](#)
[Nigerian.Daily](#)
[ThisDay.Online](#)
[BBC.News](#)
[African.Events](#)
[Nigerian.Video](#) - [Online.Nigeria](#)
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[Nollywood](#) - [Free.Nigerian.Movies](#)
[African.Theater](#)
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[African.Theater](#)
[West.African.News](#)
[Vanguard.Online](#)
[EFA](#)

[Members e-mail Login](#)
[Dollar to Naira Converter](#)

PCNI Links

[National Officers](#)
[AGM Reports](#)
[PCNI Video](#)
[PCNI Music](#)

PEOPLES CLUB ANTHEM

Peoples Club Bu Ndi Ezigbo Onumel
 Peoples Club Bu Ndi Ezigbo Onumel Na
 Nigeria O'O O Odogwu O'O
 Omelu Ka Olorulu O
 Fa Kwenili Ekwesi
 Aje Uru Di Uro
 Ezi Ada Kai Ego
 Odi Ofala; Anakwedebe
 Peoples Club Odogwu
 Igiligi Adagbu Kwa Na anyi O'O
 Igiligi Adagbu Kwa Na anyi O'O
 Igiligi Ada Gbu Kwa Na Anyi O
 Odi Ofala; Anakwedebe

ADVERTISEMENT / ANNOUNCEMENTS

Patron Nze (Dr) Sir Vincent and Lolo Victoria
 Nwabele's Patron celebration in Houston Texas on
 November 19-23, 2014 was fantastic and an event
 to remember. It was filled with activities and fun.
 Dignitaries came from Nigeria, the United Kingdom,
 Canada, the United States of America etc. Click on
 this link to view the gallery of photos. Enjoy!!!
[Click here to view the photo gallery.](#)



Take a glance at the
 Philadelphia Induction
 ceremony. dignitaries
 travelled for Nigeria, the
 United Kingdom,
 Canada, the United
 States of America to
 grace the occasion.
 Click on this link to
 view the pictures.
 Enjoy!!!

PCNI PHILADELPHIA 2014 INDUCTION

Click on this link to view the gallery of photos. Enjoy!!!
[Click here to view the photo gallery.](#)

PCNI HQ ONITSHA NIGERIA

The famous and prestigious Eze Okoko,
 Father, Patron and Trustee of Peoples Club of
 Nigeria International poses for the camera at
 the AGM meeting in Onitsha December 2013

Peoples Club of Nigeria International, AGM
 meeting Onitsha Nigeria 2013 more



LOCAL BRANCHES

[Houston Branch](#)
[Washington DC Branch](#)
[Miami Branch](#)
[Galveston Branch](#)
[Princeton Branch](#)
[Dallas Branch](#)
[Boston Branch](#)
[Philadelphia Branch](#)
[Toronto Branch](#)
[Atlanta Branch](#)
[New York Branch](#)
[Cherry Hill Branch](#)
[San Francisco Branch](#)
[Princeton Junction Branch](#)
[Chicago Branch](#)
[Arlington Branch](#)
[New Haven Branch](#)
[Los Angeles Branch](#)
[San Antonio Branch](#)
[Virginia Beach Branch](#)
[Austin Branch](#)

April 2015						
S	M	T	W	T	F	S
	1	2	3	4		
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

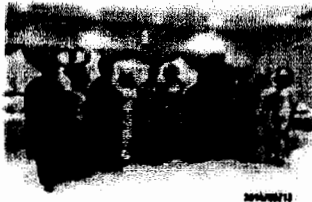
Powered by Calendar Labs

ANNOUNCEMENTS





HRM Igwe [Dr] Arinze addresses members of the Central Executive Council [CEC] in Philadelphia



MEET YOUR PATRONS
Houston Delegates at Atlanta Induction 2014
Snap Shots

Hon Chairman Ochiagha and his Beautiful Wife of New York Branch



Atlanta Branch 2014 Induction Ceremony 2014



Produced by Professor Emmanuel Opara
Asst. National Public Relations Officer and Director of Communications
Click and Enjoy

Patron Ambrose Iddi Mgbako, MD and Lolo [Lady] Mgbako



Patron Professor Innocent and Lolo Aleku



Hon Chief (Mrs.) Nkachi Iroko - Slimfit Omereigbo I Eziwuzue, Hon Chairman of Cherry Hill Branch

Peoples Club Protocol is what separates the club from every other organization. That's what gives members the dignity and sense of belongingness while elevating the club above all other organization. Everything about the club follows a certain formality and etiquette. Peoples Club membership is all about respect, recognition for each other and adherence to a strict code of social ethics and decorum. Peoples Club is about class, elegance and nobility. It is a privilege to belong and this is why many are called but a few are chosen. From the pageantry and ostent of simple entrance of members, to sitting arrangements, to the way they talk and when they talk, Peoples Club members exude enthusiasm, orderliness and discipline. They have a superior sense of hierarchy, procedure and show of excellence. In Peoples club there is no hurry. It must be done right. It is a matter the protocol — the Peoples Club way!!

If you have any questions and concerns please contact Professor Emmanuel Uzoma Opara by clicking here.

E

X

H

I

B

I

T

T

Exhibit “T”



Main Menu

[Home](#) [PCNI News](#)
[Members Business](#)
[Private Messaging User](#)
[Profile Job Listings](#)
[World News Events](#)
[Calendar Classifieds Ads](#)
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Officers

[AGM Report](#)

[PCNI Videos](#)

[Nigerian News](#)

[PCNI Music](#)

[PCNI Anthem](#)

Mini Calendar

Mar 2015						
Su	Mo	Tu	We	Th	Fr	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
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[PCNI SPONSORS](#)

[NIGERIAN WEB DESIGN](#)

[NigerianEvents](#)

About Peoples Club of Nigeria International

Peoples club was formed in 1971 in Aba (Aba state of Nigeria) by a small group of individuals led by Chief Titus I. Ume-Ezeoke of blessed memory. It was a period of hopelessness following the devastation of the Nigeria civil war which ended in 1970. It was formed with the spirit of uniting people of like-minds, for social interaction. It was timely and it was well received because of it's founding principle of "be your brother's Keeper" embodied in it's motto: unity, love & Service [Continue Reading >>>>>](#)



**CHIEF DR EZE
 CELEBRATES
 PCNI PATRONSHIP
 IN STYLE**



PCNI News and Information

- [Chief Austin Ilodibe die...](#) (2008/1/28)
- [Oliver De Coque is dead!](#) (2008/1/24)
- [Chief Stephen Osita Osadi...](#) (2007/5/20)



**CHIEF BEN GINGE
 OF DALLAS BRANCH
 PASSES ON...**



2010 AGM MEETING
 PCNI Up Coming Events calendar
 No Events

[Michael L. Lewis](#)

Spotlight



PCNI DISCUSSION



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Asaba Convention 19...
 (2011/1/31)



Asaba Convention 19...
 (2011/1/23)



AGM 2010 (2011/1/23)



AGM 2010 (2011/1/23)



AGM 2010 (2011/1/23)

PCNI World - Wide Branches

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- [Go Naira](#) (488)
- [Nigerian Net](#) (441)
- [hostmaker.net](#) (321)
- [Nigerian Events](#) (307)



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PCNI Business Listings

- [Host maker Inc](#) (2011/1/24)

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